

#### Effective: December 31, 2019

<u>Freight.gls-us.com</u> (the "Site") is a website owned and operated by GLS Freight, Inc. ("Company," "GLS Freight," "we," "us," etc.). This Privacy Policy informs you how your information is collected and used by us when you access our Site and/or services offered by us through our Site ("Services"). By accessing our Site and/or using our Services, you acknowledge you have read and understand this Privacy Policy and agree that we may collect and use your information in accordance with this Privacy Policy. If you do not agree with the terms of this Privacy Policy, please do not access our Site and do not use our Services.

Your use of the Site and Services is also subject to our Terms of Use at <u>www.freight.gls-us.com.</u>

This Privacy Policy only applies to the information collected and used by us from our Site and the Services and does not apply to information collected through any services provided by third parties including our affiliates that you may access through our Site or our Services. Company is not responsible for such thirdparty services, privacy policies, privacy practices or the content of such third party Site, even if such third party is the Company's affiliate or related entity.

### The Data We Collect

In performance of the Services or if you used the Site, Company collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, we may have collected the following categories of personal information from you within the last twelve (12) months:

Category of Personal Information	Source(s) of Personal Information	Purpose(s) of Collection	Categories Of Third Parties with Whom Personal Information is Shared
Identifiers, such as your name, address, account number, email address, phone number and IP address	Directly from you Indirectly, when you browse and otherwise use the Site From a third party customer who wants to deliver a package to you	To provide our Site and Services (see below) To deliver relevant advertisements To send marketing communications	Parent companies and affiliates for business purposes Third party service providers for business purposes Third parties who help us to serve targeted advertisements



Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as your signature, and credit or debit card number	Directly from you	To provide our Site and Services (see below)	Parent companies and affiliates for business purposes Third party service providers for business purposes
<u>Protected</u> <u>classification</u> <u>characteristics under</u> <u>California or federal</u> <u>law</u> , such as your age, race, veteran or military status, marital status and citizenship	Directly from you	To provide our Site and Services (see below)	N/A
Commercial information, such as your purchase history, shipment tracking number, status of shipment, delivery location and picture of shipment	Directly from you	To provide our Site and Services (see below)	Parent companies and affiliates for business purposes Third party service providers for business purposes
Internet or other similar network activity, such as your browsing history, search history, information on your interaction with the Site or advertisements	Indirectly, when you browse and otherwise use the Site	To provide our Site and Services (see below) To deliver relevant advertisements To improve user experiences by making our Site easier to use and navigate	Parent companies and affiliates for business purposes Third party service providers for business purposes Third parties who help us to serve targeted advertisements



<u>Geolocation data</u> , such as your city, state or address	Directly from you Indirectly, when you browse and otherwise use the Site From a third party customer who wants to deliver a package to you	To provide our Site and Services (see below)	Parent companies and affiliates for business purposes Third party service providers for business purposes
Professional or employment-related information, such as your current or past employment history and education	Directly from you	To process applications for jobs with Company	Parent companies and affiliates for business purposes Third party service providers for a business purpose, such as to conduct background checks
Inferences drawn from other personal information, such as profiles reflecting your preferences and behavior	Indirectly, when you browse and otherwise use the Site	To provide our Site and Services (see below) To deliver relevant advertisements To improve user experiences by making our Site easier to use and navigate	Third party service providers for a business purpose Third parties who help us to serve targeted advertisements

We collect certain information from you when you open an account with us or otherwise use our Site and Services. We collect personal information directly from you, directly from third party customers who provide us with your information in order to allow us to deliver a package to you, and indirectly from you when you browse and otherwise use the Site.

We also collect aggregate data for internal reporting, and we count, track, and aggregate visitors' activity for the purpose of analysis of general traffic flow and feature usage related to *our Site*.

# **Cookies and Other Similar Technologies**

We, and third parties we allow, may use cookies or other automatic technologies to collect information about your online activities while using our Site. We may use session cookies or persistent cookies. Some features



allow data to remain only for the time that your browser is open, for example a session cookie. A persistent cookie is an example of functionality that your browser provides that allows the data to persist on your device/computer even after the browser is closed. The information we collect automatically may include the name of your internet service provider, the Internet protocol ("IP") address you are using, the date and time you accessed the Site, and other similar information. An IP address is a number that automatically identifies the computer or device you use to access the Internet. The IP address enables our server to send you the web pages that you want to visit, and it may disclose the server owned by your Internet service provider. We may use IP addresses to conduct analyses and performance reviews and to administer the Site. Cookies and similar technologies within a web browser also allow persistent storage of data as you navigate the website. This functionality does not personally identify users, although it does allow the web server to differentiate one user from another. Many website use cookies and similar technologies to provide website and application features when a user visits the website, and most web browsers are set up to accept cookies. We use cookies to: allow our Site to function and improve delivery of your online experience; remind us of who you are and to access your account information to deliver better Services; estimate our audience size and usage of our Site, including measuring repeat usage of the Site; deliver advertisements that are more relevant to you based on your interests and to help measure the effectiveness of those advertising campaigns; and measure and track certain traffic patterns, including information like the areas of the Site you have visited to better personalize content, banners and promotions.

You can set your browser to refuse cookies, but some functionality of your experience may not work properly and you may be required to re-enter certain information each time you use our Site.

We use cookies provided by **Google Analytics** to better understand and personalize your use of the Site and Services. Google Analytics collects information like demographic data, how often users visit our website, what pages they visit when they do so, and what website they used prior to coming to our website. To process analytics data when you visit *our Site*, Google Analytics may use various technologies, including cookies or similar technologies to identify your browser or computer device. Google does not receive your user account information, your email address, or other personally identifiable information through the use of Google Analytics cookies. You can learn more about Google Analytics and/or **opt out of Google Analytics** on this website: How Google Uses Data <u>When You Use Partner Site Or Apps</u>.

We use Google AdWords remarketing service to advertise on third party website. Remarketing could be, for example, in the form of an advertisement on the Google search results page or on any website in the Google display network. Third-party vendors, including Google, use cookies to serve ads based on a user's browsing history. You can set preferences for how Google advertises to you using the <u>Google Ad Preferences page</u>, and you may opt out of interest-based advertising by, for example, manipulating cookie settings or permanently using a browser plugin.

You may opt out of interest-based advertising by entering your preferences in cookie settings or permanently using a browser plugin. The Network Advertising Initiative also offers a means to opt-out of a number of advertising cookies. Please visit <u>https://www.networkadvertising.org/</u>to learn more. Note that opting-out does not mean you will no longer receive online advertising. It does mean that the company or companies from which you opted-out will no longer deliver ads tailored to your preferences and usage patterns.



### How We Use Your Personal Information

We use your personal information to provide our Site and Services, and to engage in the activity and related activities for which we collect it. Specifically, we use your personal information to:

- Set up your account
- Perform our Services, including shipping services, tracking services, communications with consumers regarding our Services and preparing agreements
- Provide support and resolve questions or issues relating to the Services and/or our Site, or otherwise in connection with the Services
- Improve our Site and Services and for statistical analysis, such as, to estimate our audience size and usage patterns
- Improve, develop, promote and expand our brand name
- Advertise on third party website if you have previously visited the Site
- Send communications regarding special offers, promotions and enhancements to our Site via email, when you choose to receive such communications
- Address activities such as managing Company assets, conducting audits and investigations, finance and accounting, implementing business controls and drafting management reports and analysis
- Maintain the safety, security, authentication and integrity of our customers, vendors, business partners, Site, Services, databases and other technology assets
- Comply with applicable laws, court orders and regulations, including responding to law enforcement requests

### How We Share Your Personal Information

We share or disclose your personal information to the following categories of third parties and for the following reasons:

- Parent companies and affiliates, as needed for business purposes.
- Employees if and to the extent necessary for the performance of their tasks. In such a case, access will only be granted if and to the extent necessary for the business purpose.
- Third party service providers, agents or independent contractors who help us maintain our Services and provide other administrative services to us. All service providers are required to both keep personal information confidential and not to use it for any purpose except performing the services we request. For example, we use a third-party service provider to manage credit card processing that is permitted to store, retain, and use personal information only for the purpose of providing credit card processing and related services.
- Third parties who help us to serve targeted advertisements.
- We may share personal information in the course of any direct or indirect reorganization process including, but not limited to, mergers, acquisitions, bankruptcies, and sales of all or substantially all of our assets.
- We may disclose personal information to law enforcement, government agencies, and other related third parties, in order to comply with the law, enforce our policies, or protect our or others' rights, property or safety.



### **Opt-Out**

We provide you the opportunity to opt-out of marketing communications by clicking the "unsubscribe" link in email communications or by contacting us at <u>privacy@gls-us.com</u>. In certain circumstances, when you create an account, you can choose not to receive information and offers by email. We will process your request as soon as possible in accordance with applicable law, but please be aware that in some circumstances you may receive a few more messages until the unsubscribe is processed.

Additionally, we may send you information regarding our Site and Services, such as information about changes to our policies and other notices and disclosures required by law. Generally, users cannot opt out of these communications, but they will be primarily informational in nature, rather than promotional.

### Security

We implement reasonable security measures to ensure the security of your personal information. Please understand, however, that no data transmissions over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us and you understand that any information that you transfer to us is done at your own risk. If we learn of a security systems breach we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Site or Services or providing your personal information to us, you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of the Site and Services. We may post a notice via our Site if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

Customers are responsible for maintaining the confidentiality and security of their user registration and password.

### **Collection of Data from Children**

Our Site are not intended for children under 18 years of age, and we do not intend to collect any personal information from such children. In the event that we learn that a person under the age of 18 has provided personal information to us, we will delete such personal data as soon as possible.

# How Long We Keep Your Personal Information

We keep your personal information for as long as necessary or advisable with regard to the purpose for which it as collected and we reserve the right to retain it to the full extent not prohibited by law.

# Your California Privacy Rights

From January 1, 2020, California residents have the following rights:

• <u>Right to Know</u> – You have the right to request information about the categories and specific pieces of personal information we have collected about you, as well as the categories of sources from which such information is collected, the purpose for collecting such information, and the categories of third parties with whom we share such information. You also have the right to request information about our sale or disclosure for business purposes of your personal information to third parties.



- <u>Right to Delete</u> You have the right to request deletion of your personal information, subject to certain exceptions as permitted by law.
- <u>Right to Opt-Out of Sale</u> You have the right to opt-out of the sale of your personal information to third parties. From January 1, 2020, you can exercise this right through the "Do Not Sell My Personal Information" link <u>here</u> and in the footer of our Site. Please note we do not sell the personal information of minors under 16 years of age without affirmative authorization.
- <u>Right to Non-Discrimination</u> You have the right to not be discriminated against for exercising any of these rights

If you would like to exercise one or more of the above rights, you can contact us at <u>privacy@gls-us.com</u>, or print out the form available at <u>CCPA Privacy Rights Request Form</u>, fill it out and mail it to us at **P.O. Box 2569 Manteca, CA. 95336, Attention: Privacy Manager** or have it emailed to <u>privacy@gls-us.com</u>. We may need you to provide additional information to verify your request, such as providing data elements so that we can confirm they match the information already maintained by us. We will not use this additional information for anything other than handling your request. Please note that you may designate an authorized agent to make a request in certain circumstances on your behalf. Such authorized agent must be registered with the California Secretary of State.

We endeavor to respond to all such requests within forty-five (45) days, although there may be a brief delay in processing a request while we verify that the request is valid and originates from you as opposed to an unauthorized third party. If we require more time, we will inform you of the reason and extension period in writing.

Additionally, California Civil Code Section 1798.83 permits visitors to the Site who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We do not share personal information with third parties for their direct marketing purposes.

# How We Respond to Do Not Track Signals

At this time our Site do not recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.

# **Changes to this Privacy Policy**

Company may, from time to time, revise the terms and conditions of this Privacy Policy. Company will provide notice of such modifications by publishing them on our Site and revising the "Effective Date" above. Material revisions to the terms shall be effective no sooner than thirty (30) days after posting on the Site. Your continued use of the Site and Services following the posting of changes to this Privacy Policy will mean that you accept those changes.

# **Contact Us**

You may write to us at <u>privacy@gls-us.com</u> for any privacy concerns and requests relating to this Privacy Policy, or our Site, our Services or any other aspects of our Site.