

Privacy Policy

Effective Date: February 18, 2021

The operator of this website and its affiliates (referred to herein as “**Distributor**” or “**we**”) collect information about you when you use this website and other websites, applications or other online services that we operate (collectively, the “**Services**”).

BY USING THE SERVICES, YOU CONSENT TO THE PROCESSING OF INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY.

IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY, THEN PLEASE DO NOT USE THE SERVICES.

1. SCOPE OF THIS PRIVACY POLICY

This Privacy Policy describes the information that Distributor collects (directly or indirectly) and why we collect it, what we do with the information we collect and how you can manage your information through the Services. This Privacy Policy applies to you when you use our Services or communicate with us offline, such as by telephone. California residents, for more information on your rights under the California Consumer Privacy Act (“CCPA”) please review the “Your California Privacy Rights” section of our Privacy Policy. You can download a printable copy of this Privacy Policy [here](#).

If a particular Service has its own privacy policy or links to a different privacy policy, then that privacy policy -- not this Privacy Policy -- applies. This Privacy Policy also does not apply to any website or service that does not display or link to this Privacy Policy.

Our agreements with certain customers may contain provisions about the collection, use, storage and disposal of Personal Information collected through the Services and offline. If a provision of a customer agreement conflicts or otherwise is inconsistent with a provision of this Privacy Policy, then such provision of the customer agreement will prevail but solely to the extent of the conflict or inconsistency.

If you have not done so already, please also review the Terms of Service.

If you have a question about this Privacy Policy, please contact Distributor via email at the email address listed on this webpage (“**Contact Email**”).

2. INFORMATION WE COLLECT

- **Identifiers.** Such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
- **Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).** Such as name, address, or telephone number. Some personal information included in this category may overlap with other categories.
- **Commercial information.** Such as records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- **Internet or other similar network activity.** Such as browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.

We may link together different types of Usage Information or link Usage Information to Personal Information. If linked information directly or indirectly identifies an individual person, then Distributor treats the linked information as Personal Information.

For the purposes of this Privacy Policy, to “**process**” Personal Information means to perform any operation on Personal Information, whether or not by automated means, such as collecting, recording, organizing, storing, adapting, using, disclosing, combining, erasing or destroying.

To process your information as described in this Privacy Policy, we rely on the following legal bases:

- (a) **Provide our Services to you:** Most of time, the reason we process your information is to perform the contract that you have with us. For example, we use your information to maintain your account.
- (b) **Legitimate interests:** We use your information when we have legitimate interests in doing so. For example, we analyze users' behavior to continuously improve Services and for administrative, fraud detection and legal purposes.
- (c) **Consent:** From time to time, we may ask for your consent to use your information for certain specific reasons. You may withdraw your consent at any time by contacting us using the Contact Email.

3. HOW WE COLLECT INFORMATION

User Provided Information: We collect information that you provide directly to us, such as when you create or modify your account, request customer support or otherwise communicate with us. This information includes (a) your name, postal address, email address and telephone number; (b) username, password and other registration information; (c) transaction-related information, such as when you download or use applications from us or register for the Services; (d) information you provide us when you contact us for help; and (e) other information you choose to provide and enter using the Services.

If you make payments through the Services we may also collect information required for payment processing, such as credit or payment card number, expiration date, cvv number, billing address, company name, and other information required for payment processing (“**Payment Information**”).

We use a third party payment processors, currently PromoPayment, Authorize.net, and Paypal, (“Payment Processors”) to assist in securely processing your Payment Information. If you pay with a credit card the Payment Information that you provide through the Services is encrypted and transmitted directly to one of the Payment Processors. We do not store your Payment Information and do not control and are not responsible for the Payment Processors or its collection or use of your information. You may find out more about how the Payment Processors store and use your Payment Information by accessing the Payment Processor’s Privacy Policy.

If you choose to use PayPal to make purchases through the Site, you will be directed to the PayPal website and provide your payment information directly to PayPal. PayPal’s privacy policy applies to the information you provide on the PayPal website.

Automatically Collected Information: The Services automatically collect information about how you use the Services, such as (i) your mobile device or computer type, including your system and application software; (ii) the type of mobile device or computer you use, the pages and screens you view and how long you viewed them; (iii) your mobile device’s unique device ID; (iv) the IP address of your computer or mobile device; (v) your operating system, traffic data, logs and other communication data; and (vi) metadata and other information associated with other files stored on your device (e.g., photographs, audio and video clips and personal contacts). Some of this automatically collected information is Personal Information.

Information Collected from Third-Party Sources: We may combine information we receive from other sources with information we collect through the Services. For example, (A) if you engage with a third-party site application whose API we use (or who uses our API), we may receive information about you or your

connections from such site or application; or (B) if you are referred to us by one of our referral partners, we receive information about you from such referral partner.

4. COOKIES AND OTHER DATA COLLECTION TECHNOLOGY

The Services may use cookies, pixel tags (also known as web beacons, flash cookies and clear GIFs) and similar technology (“**Data Collection Technology**”).

Cookies are small text files that are sent to or accessed from your web browser or your computer's hard drive. A cookie typically contains the name of the domain (*i.e.*, the internet location) from which the cookie originated, the “lifetime” of the cookie (*i.e.*, when it expires) and a randomly generated unique number or similar identifier. A cookie may contain information about your computer, such as user settings, browsing history and activities conducted while using the Services. A web beacon (also called a pixel tag or clear GIF) is a piece of computer code that enables us to monitor user activity and website traffic. To learn more about cookies and web beacons, visit www.allaboutcookies.org.

Data Collection Technology helps us improve your experience of the Services by, for example, storing your password, measuring the success of marketing campaigns, compiling statistics related to use of the Services and helping us analyze technical and navigational information about the Services in order to detect and prevent fraud.

We may use other Data Collection Technology to collect information from the computer or device that you use to access the Services, such as your operating system type, browser type, domain and other system settings, including the language your system uses and the country and time zone in which your computer or device is located.

We also use Google Analytics, which is a Google service that collects aggregate information about use of the Services and reports website trends. Google Analytics does not directly identify individual users. You can learn about Google's practices and opt out by visiting www.google.com/settings/ads or by downloading the Google Analytics opt-out browser add-on at <https://tools.google.com/dlpage/gaoptout>.

Your Control of Cookies: Some web browsers, including some mobile web browsers, provide settings that allow you to control or reject cookies or to alert you when a cookie is placed on your computer, tablet or mobile device. You also may be able to reject mobile device identifiers by activating the appropriate setting on your mobile device. Although you are not required to accept cookies or mobile device identifiers, if you block or reject them, you may not have access to all features available through the Services.

Do Not Track Signals: Some web browsers, including Safari, Internet Explorer, Firefox and Chrome, incorporate a “Do Not Track” (“**DNT**”) or similar feature that signals to websites that a user does not want to have his or her online activity and behavior tracked. If a website that responds to a particular DNT signal receives such DNT signal, the browser can block that website from collecting certain Personal Information. Not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, many website operators, including Distributor, do not respond to DNT signals.

5. HOW WE USE INFORMATION

We may use the information that we collect about you to (a) operate and provide you with the Services; (b) enhance and improve the Services (*e.g.*, by identifying business partners who can provide supplementary services); (c) fulfill any other purpose for which you provide your information; (d) carry out Distributor's obligations and enforce Distributor's rights arising under any agreement between Distributor and you; (e) notify you when updates to the Services are available; (f) send or facilitate communications between you and other users (*e.g.*, between a driver and fleet operator in connection with your use of certain features of the Services); (g) determine how the Services are used, analyze trends and improve the Services; and (h) to secure and protect the Services and prevent and investigate fraud and other misuses of the Services.

6. HOW WE SHARE INFORMATION

Distributor shares your Personal Information as requested by you (e.g., to process payments), for any purpose disclosed by Distributor when you provide such information, to fulfill the purpose for which you provide such information, and in order to provide the Services for which you signed up.

Distributor may share your information (a) with Distributor's affiliates and business partners who help us provide, analyze and improve the Services; (b) with a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Distributor's assets; (c) to comply with any court order, law or legal process, including to respond to any governmental or regulatory request; (d) to carry out Distributor's obligations and enforce Distributor's rights arising under any agreement between Distributor and you; and (e) if Distributor believes disclosure is necessary to protect the rights, property or safety of Distributor, our customers or others. Additionally, we may share your information with companies that are conducting marketing and advertising to benefit Distributor. These third party companies may use your contact information for communications and marketing purposes that support our activities. You are under no obligation to respond and the companies are restricted from using your contact information for any other purpose.

Distributor may disclose Usage Information without restriction.

7. YOUR CHOICES ABOUT INFORMATION

You can stop collection of information by of the Services by ceasing to use such Services.

If you would like to review, correct, update or delete Personal Information that you have previously provided to us or if you would like to suppress, restrict or receive an electronic copy of your Personal Information (if these rights are provided to you by applicable law), please contact us via the Contact Email.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database and any other limitations you would like to put on our use of your Personal Information. For your protection, we only fulfill requests when received from the email address associated with your account. We may need to verify your identity before fulfilling your request.

Please note that we often need to retain certain information for recordkeeping purposes and/or to complete any transaction that you began prior to requesting a change or deletion. We also may not allow you to review certain data for legal, security or other reasons.

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law. The criteria used to determine our retention periods include:

- (a) the length of time we have an ongoing relationship with you and provide Services to you (e.g., for as long as you have an account with us or keep using the Services);
- (b) whether there is a legal obligation to which we are subject (e.g., certain laws require us to keep records of your transactions for a certain period of time before we can delete them);
- (c) whether retention is advisable considering our legal position (e.g., for statutes of limitations, litigation or regulatory investigations).

If at any time you believe that we have not adhered to this Privacy Policy, please let us know. We will use good faith efforts to determine and correct the problem.

Notice to California Residents: California Civil Code Section 1798.83 permits individual California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us at the Contact Email. Please note, however, that Distributor does not disclose Personal Information to third parties for their direct marketing purposes.

8. SECURITY OF YOUR INFORMATION

We are concerned about safeguarding your information. We use physical, technical, and organizational safeguards intended to protect information that we process and maintain. Unfortunately, however, no system or online transmission of information is completely secure. We cannot guarantee the security of information transmitted to or through the Services. Any transmission is at your own risk and we expect that you will use appropriate security measures to protect your information.

You are responsible for maintaining the security of any password or other form of authentication involved in obtaining access to password-protected or secure areas of the Services. Access to the Services through your credentials will be treated as authorized by you. Unauthorized access to password-protected or secure areas is prohibited and may lead to criminal prosecution. We may suspend your use of all or part of the Services without notice if we suspect or detect any breach of security.

If you believe that information you provided to us is no longer secure, please notify us immediately using the Contact Email.

9. LINKS TO OTHER WEBSITES AND SERVICES

The Services may include links to third-party websites and services that are not operated by us. When you click these links, you will be directed away from the Services. A link to a third-party website or service does not mean that we endorse it or the quality or accuracy of the information presented on or in such third-party website or service. If you decide to visit a third-party website or service, you are subject to its privacy practices and policies, not ours. This Privacy Policy does not apply to any Personal Information that you provide to these other websites and services.

10. CHANGES TO PRIVACY POLICY

The Effective Date of this Privacy Policy is set forth at the top of this webpage. As we add new features to the Services, we may amend this Privacy Policy. If we make a material change to this Privacy Policy that reduces your privacy rights, we will notify you in advance by sending an email and/or posting a notice in the Services. Your continued use of the Services after the Effective Date constitutes your acceptance of the amended Privacy Policy. The amended Privacy Policy supersedes all previous versions.

11. CHILDREN'S PRIVACY

The Services are not directed to or intended for use by minors. Consistent with the requirements of the U.S. Children's Online Privacy Protection Act, if we learn that we have received any information directly from a child under age 13 without his or her parent's verified consent, we will use that information only to respond directly to that child (or his or her parent or legal guardian) to inform the child that he or she cannot use the Services.

12. CALIFORNIA RESIDENTS

Information We Collect

Our Services collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("**personal information**"). In particular, the Services collect or may have collected the following categories of personal information in the last twelve (12) months. We obtain the categories of personal information as described in the "Information We Collect" section above.

Where noted in this Policy, the CCPA temporarily exempts personal information reflecting a written or verbal business-to-business communication ("B2B personal information") from some its requirements.

Use of Personal Information

We may use, sell, or disclose the personal information we collect for one or more of the business purposes indicated in the “How We Use Information” section above.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. In the preceding twelve (12) months, we have shared your personal information with the categories of third parties listed in the “How We Share Personal Data” section above.

We do not sell personal information. In the event that we do sell any personal information, we will update this Privacy Policy to list the categories of consumers’ personal information sold.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Right to Access Specific Information and Data Portability Right

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, the business purpose for which personal information was disclosed, and the personal information categories that each category of recipient obtained.

We do not provide a right to know or data portability disclosure for B2B personal information.

Right to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We do not provide these deletion rights for B2B personal information.

Exercising Your Rights

To exercise the access, data portability and deletion rights described above, please submit a verifiable consumer request to us by emailing us at the Contact Email address.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make such a request for access or data portability twice within a 12-month period. The verifiable consumer request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, and describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response electronically. Any disclosures we provide will only cover the 12-month period preceding the receipt of the verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

13. Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights.

14. NOTICE TO INTERNATIONAL VISITORS

We are headquartered in the United States and the Services are controlled and operated from the United States. We process and store Personal Information in the United States, where privacy laws may not be as protective as in your place of residence. If you are using the Services from outside of the United States, by providing your Personal Information to us, you consent to the transfer of your Personal Information to the United States for processing consistent with this Privacy Policy.

15. CONTACT US

If you have any questions regarding privacy while using the Services or have questions about our practices, please contact us via email at the Contact Email.