

# **PRIVACY POLICY**

## **GENERAL INFORMATION**

This Privacy Policy explains what types of information Bransys Group and its wholly-owned subsidiaries ("Bransys," "we," or "us") or our service providers may collect from or about visitors to, or users of, our websites or applications ("you"), and describes our practices for collecting, using, retaining, protecting, disclosing, and transferring such information.

## SCOPE

This Privacy Policy applies to personal information and other information collected and controlled by Bransys or its service providers from or about you when you (i) access Bransys' websites, (ii) use Bransys applications (including mobile applications), products or services (individually and collectively, the "Services"), or (iii) open and respond to our e-mails. For purposes of this Privacy Policy, "personal information" means information that can be used to personally identify you, such as your name, address, telephone number, e-mail address, user IDs and passwords, billing and transaction information, credit card or other financial information, contact preferences, and similar information.

## INFORMATION WE COLLECT AS DATA CONTROLLER

When expressing an interest in obtaining additional information about the Services offered by us, or by registering to use the Services, Bransys requires you to provide us with personal contact information, such as name, company name, address, phone number, and email address. When purchasing the Services, Bransys may require you to provide us with financial qualification and billing information, such as billing name and address, credit card number, and the number of employees within the organization that will be using the Services. Bransys may also ask you to provide additional information, such as company fleet size, size of your field services staff, annual revenues, number of employees, or industry.

We may also obtain information about you that we collect from sources such as at conferences, meetings and seminars. We also may collect information through official Trucking Registry, chat rooms, blog posts, newsgroups, and social networking sites. The information you allow us to access on social networking sites varies by social networking site, and it is affected by the privacy settings you establish at such site. You can control and find out more about the privacy settings of your social networking site on the applicable social networking site directly. Our website and Services may include social media features, such as the Facebook "Like" button or a "share this" feature. Your use of these features may direct you to Facebook, LinkedIn, Twitter, +Google or other social networking sites, but we do not collect information when you click on these features. We may also collect information about you from your friends or associates who tell us you may be interested in our Services.

In some of our geographic locations, and to the extent permitted by applicable laws, we may monitor or record your telephone conversations with us for quality control purposes, for purposes of training our employees and for our own protection.

We may also collect any information that you provide to us in connection with the use of our Services. We acknowledge your ownership rights in the information that you provide. We also may collect information that is related to you but that does not personally identify you, such as your computer's operating system, browser, and information regarding your use of and activities on our websites or applications. See also the section below on cookies and other electronic tools used for the collection of such information. We may collect vehicle information, such as location and speed, through your use of our vehicle tracking Services, which we use to provide Services to our clients and for our own purposes.



We own the information we collect through our vehicle tracking device in its aggregate and anonymized form and we reserve the right to use such aggregate, anonymized information without restriction.

## USE OF INFORMATION WE CONTROL

Bransys may use information that we collect from or about you, including any personal information: to welcome you to our website or Services; to help you complete a transaction or in order to deliver information or Services requested by you; to bill you for Services you purchased; to provide ongoing service and support, including event-related communications with respect to our Services; to notify you about changes to our websites or applications, or any Services we offer or provide through them; to improve our websites, applications, and Services, including by developing data analytics and reports about your use of them; to contact you to complete surveys that we use for marketing or quality assurance purposes; to deliver or display tailored online advertisements that may interest you; to e-mail or otherwise send you marketing or other promotional information about Bransys or others' products or services that may interest you; to combat fraud or any other criminal activity; to fulfill any other purpose for which you provide the information; or in any other way we may describe when you provide the information; or in any other way we may describe when you provide the information; or permitted by law; or for any other purpose with your consent.

## DATA WE PROCESS FOR OTHERS

We also may collect personal information from our clients who use our Services, who may elect to provide personal information into the system in order to utilize the Services. We process this information on behalf of our clients and only for their use of the system. We do not use or disclose such personally identifiable information except to provide the Services and in accordance with the instructions of the client as data controller.

# COLLECTION OF INFORMATION USING COOKIES AND OTHER TOOLS

Bransys may collect and/or log your IP address, Internet domain name, the web browser and operating system used to access Bransys websites or applications, the pages or files visited, the time spent in each page or file, and the time and date of each visit or use. Bransys may collect this information automatically as you browse our websites or use our applications through the use of log files, web beacons, or other electronic tools.

## COOKIES

Bransys may use cookies to automatically collect information about your use of our websites. A "cookie" is a text file that is sent from a Web server to your browser and stored on your computer's hard drive or mobile device. Thereafter, when you visit that website, a message is sent back to the web server by the browser accessing the website, and this information about your activities is stored in the cookie. Use of cookies allows Bransys to provide a higher quality, more relevant, customer experience. The information collected in cookies (e.g., the web pages you visit on the website and navigation patterns, the date and time of your visit, the number of links you click within the site, the functions you use on the site, the databases you view and the searches you request on the site, the data you save on, or download from, the site, the websites you visited immediately before and after visiting the site, and when you open our e-mails or click on any of their links) is used and analyzed to improve our service to you and to personalize your web-browsing experience by providing Bransys with a better understanding of your interests and requirements regarding our websites and applications. Use of cookies may also allow us to automate entry into password-protected portions of our website so that you will not need to re-enter your password each time you visit such website. Cookies alone do not personally identify you; they are designed to recognize your web browser. However, if you have provided us with personal information, such as through completion of a web form, cookies may be linked to your personal information, such as your e-mail address or password.

Bransys uses cookies that are session-based and persistent-cookies. Session cookies exist only during one session. They disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer after you close your browser or turn off your



computer. You have the ability to accept or decline cookies by modifying the settings in your browser. For more information about how to manage cookies in your web browser, see <u>www.aboutcookies.org</u>. Please note that if you disable your web browser's ability to accept cookies, you will not be able to navigate Bransys websites, and you will not be able to successfully use the Services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will place cookies when you log on to our websites.

#### MANAGING COOKIES

Most browsers allow you to control cookies, including whether or not to accept them and provide details about how to remove them. Many browsers provide an option to notify you if you receive a cookie and allow you the ability to block cookies. Cookies may be used to gather user analytics which will be used to analyze trends and statistics. Users can opt-out of Google Analytics Advertising Features through Ads Settings, Ad Settings for mobile apps, or any other available means.

#### WEB BEACONS

When we send you emails, we may include a web beacon to allow us to determine the number of people who open our emails. Web beacons are transparent graphic images placed in emails or web pages to record the simple actions of users. For example, when you click on a link in an email, we may record your response to allow us to customize our offerings to you. Web beacons collect only limited information, such as time and date of a page being viewed, and a description of the page on which the web beacon resides (the URL). Web beacons can be refused when delivered via email. If you do not wish to allow web beacons via email, you may disable HTML images or refuse HTML (select Text only) within your email software.

#### **IP ADDRESSES**

When you visit Bransys' websites, we collect your Internet Protocol ("IP") addresses to track and aggregate non-personal information. For example, we use IP addresses to monitor the regions from which customers and visitors navigate our websites.

#### LINKS

Bransys' websites may contain links to third-party websites, including our partners' websites and others. If you access those links, you will leave the Bransys website. Bransys does not control these third-party websites or their privacy practices, which may differ from those of Bransys. These websites are not governed by this Privacy Policy, and we do not take responsibility for the privacy practices of any third-party websites to which we link. We encourage you to review the privacy policy of any third-party entity to which we link before submitting your personal information.

#### SOCIAL NETWORKING AND REFER A FRIEND

We may use chat rooms, blog posts, newsgroups, and social networking sites in order to market to you by directing users of such chat rooms, blog posts, news groups and social networking sites to our website for more information. We may use such information to contact you for consent, but will not use your information or post without such consent. If you choose to use our referral service to tell a friend about a page on a Bransys website, you will be asked to submit an email to your friend directly. Bransys does not store this information, except to the extent permitted by law. If your friends refer you to us directly we may in certain geographical locations use the contact information provided in order to market to you, in accordance with applicable law.

#### SHARING AND USAGE OF YOUR PERSONAL INFORMATION

We are the sole owner of information collected on our websites, except for content that you provide to us in connection with your use of our Services. We collect information only as necessary to fulfill the purposes set forth in this Privacy Policy and we will not sell, share, or rent this information to others in ways different from what is disclosed here. Except as described in this Privacy Policy, Bransys does not



share, sell, rent, or trade any information with third parties for their promotional purposes. We may disclose information that does not identify any individual (e.g., anonymous, aggregated data) without restriction.

Bransys contracts with third-party service providers and suppliers (including distributors and resellers) to deliver certain products, services, and customer solutions. Examples of such services provided on our behalf are mail delivery, website hosting, transaction processing, processing payments, sending emails on our behalf, providing you with support via live chat software, and event planning. Bransys may share your personal information with its service providers and suppliers to the extent necessary to deliver the product or service you requested, respond to your requests for information on products or services, or otherwise support your business needs.

Third-party service providers and suppliers receiving personal information are expected to maintain privacy and security protections that are consistent with Bransys' privacy and information security policies. These companies are authorized to use your personal information only for the purpose for which it was originally intended or as required or permitted by law.

Some Bransys websites or services may be co-branded and offered in conjunction with another company. If you register for or use such websites/services, both Bransys and the other company may receive information collected in conjunction with the co-branded website/services.

We may also disclose your personal information and other information, including across country borders: to our subsidiaries, affiliates, and worldwide offices to process such information in accordance with this Privacy Policy; to comply with the law or in response to a subpoena, court order, law enforcement or government request, or other legal process; to produce relevant documents or information in connection with litigation, arbitration, mediation, adjudication, government or internal investigations, or other legal or administrative proceedings, if Bransys determines in its good faith judgment that such disclosure is necessary to provide its services or to protect the rights, interests, safety, or property of its business, employees, suppliers, customers, or others; in connection with any proposed or actual sale or other transfer of some or all assets of Bransys, and/or any proposed or actual sale or merger of Bransys or any division of Bransys; to enforce the terms of any agreement with Bransys; to combat fraud or other criminal activity; for any other purpose disclosed by us when you provide the information; as otherwise required or permitted by law; and/or with your consent.

#### SECURITY

Bransys has implemented reasonable administrative, technical, and physical measures designed to protect your personal information from accidental loss and from unauthorized access, disclosure, use, alteration, or destruction. When you provide us with credit card information via a Bransys website, we will encrypt that information via SSL. If a password is used to help protect your accounts and personal information, it is your responsibility to keep your password confidential. Please also be careful to avoid "phishing" scams, where someone may send you an e-mail that looks like it is from Bransys asking for your personal information. If you have questions regarding our security you can contact us via support@bransys.com.

Please be aware, however, that no method of transmitting information over the Internet or storing information is completely secure. Accordingly, we cannot guarantee the absolute security of any information.

We use Microsoft Azure storage service to store some of your information (for example, your documents). You can find more information on Microsoft Azure's data security at <a href="https://www.microsoft.com/en-us/TrustCenter/Security/default.aspx">https://www.microsoft.com/en-us/TrustCenter/Security/default.aspx</a>.



### International Transfer

Your Personal Information may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you're located outside the United States and choose to provide your Personal Information to us, we may transfer your Personal Information to the United States and process it there. Your consent to this Privacy Policy followed by your submission of any Personal Information represents your agreement to that transfer.

## CHILDREN'S ONLINE INFORMATION POLICY

Bransys understands the importance of protecting children's privacy, particularly with their online interactions. Bransys websites are not designed for and do not intentionally target or solicit anyone younger than 13 years of age.

# ACCESS TO AND CORRECTING YOUR INFORMATION

If you receive marketing or similar e-mail messages from us and you wish to opt out of receiving such messages, you may follow the opt-out procedure specified in the e-mail message or you may contact <u>sales@bransys.com</u>. If after expressing an interest in our Services you wish no longer to receive marketing telephone calls from us, you can opt-out of receiving such marketing telephone calls by contact <u>sales@bransys.com</u>. If you wish to update or modify your billing information, please contact <u>sales@bransys.com</u>. Customers of Bransys Services are not able to opt out of receiving transactional emails related to their account with Bransys or the Services.

If you wish to review or modify information submitted to us directly, you should contact <u>sales@bransys.com</u>. Within 30 days of your request, Bransys will grant you reasonable access to personal information that it holds about you and take reasonable steps to permit you to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete. We will take measures to verify your identity before providing you with, or updating, you information. You may also contact us by email at <u>contact@bransys.com</u> or by regular mail at Bransys, 333 S. Wabash Ave Ste 2700, Chicago, IL 60604, United States of America.

## CHANGES TO THIS PRIVACY POLICY

Bransys will review and update this Privacy Policy periodically, and will note the date of its most recent revision above. We encourage you to review this Privacy Policy frequently to stay informed about how Bransys is collecting, using, retaining, protecting, disclosing, and transferring your information.

## CONTACTING US

If you have questions regarding this Privacy Policy or the information practices of Bransys, please contact us at <u>contact@bransys.com</u> or by regular mail to: Bransys, 333 S. Wabash Ave Ste 2700, Chicago, IL 60604, United States of America.