

## PRIVACY POLICY

This Privacy Policy describes Cargologik, Inc.'s ("Cargologik," "we," "us," "our") policies regarding the collection, use, and disclosure of personal information when you visit our website (www.cargologik.com), use the Cargologik mobile application ("Cargologik App"), or otherwise interact with us. "Personal information" is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked to a particular person. When you, or someone on your behalf, provide personal information to us, including through using our website or the Cargologik App (jointly referred to as the "Sites"), creating an account with us, or otherwise engaging with us, you agree to our collection, use, disclosure, storage, and transfer of personal information about you as described in this Privacy Policy.

This policy does not cover personal information within the scope of your relationship with us as a job applicant, employee, independent contractor, director, or officer.

### WHAT PERSONAL INFORMATION WE COLLECT, HOW WE COLLECT IT, AND WHY WE COLLECT IT

The personal information we may collect generally includes: (1) information to provide our services (e.g., contact information, payment information, shipping address); and (2) information that assists us in marketing our services.

We gather this information from you directly, your employer, or via automatic data collection tools, such as online tracking technologies. Some of our collection of personal information is required to provide our services (e.g., payment information), so if you do not provide us with the requested information, we may not be able to provide certain services to you. In the last 12 months, we have collected the following personal information from the sources, and for the purposes, described below.

<b>Personal Information We Collect</b>	<b>Where We Get It</b>	<b>Why We Collect It</b>
Identifiers and contact information such as a real name, postal address, Internet Protocol address, email address, and account name.	<ul style="list-style-type: none"><li>● You</li><li>● Your employer</li><li>● Web technologies</li></ul>	<ul style="list-style-type: none"><li>● To provide our services (e.g., facilitate shipment and process payments)</li><li>● Monitor use of the Sites</li><li>● Manage our business and customer relationships</li><li>● Data analysis</li><li>● Fraud prevention</li><li>● Marketing</li><li>● Legal compliance</li></ul>
Categories of personal information described in subdivision (e) of Section 1798.80 (e.g., name, mailing address, telephone number, credit card number, employment).	Same as above	Same as above
Commercial information, including records of personal	Same as above	Same as above

property; products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies.		
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding the consumer’s interaction with an Internet website, application, or advertisement.	We collect consumers’ Internet Protocol addresses and other online interactions through web technologies and marketing partner relationships, as explained more fully in the Digital Technologies section of this Policy.	Same as above
Geolocation data.	<ul style="list-style-type: none"> <li>• Web technologies</li> </ul>	Same as above
Audio, electronic, visual, thermal, olfactory, or similar information.	<ul style="list-style-type: none"> <li>• Customer service phone call recordings</li> <li>• Customer demonstration recordings</li> </ul>	<ul style="list-style-type: none"> <li>• To provide demonstrations to customers</li> <li>• Internal training purposes</li> <li>• Customer service oversight and improvement purposes</li> </ul>
Professional or employment-related information (e.g., current employer, job title).	<ul style="list-style-type: none"> <li>• You</li> <li>• Your employer</li> </ul>	<ul style="list-style-type: none"> <li>• To provide our services (e.g., facilitate shipment, process payments, create accounts)</li> <li>• Monitor use of the Sites</li> <li>• Manage our business and customer relationships</li> <li>• Data analysis</li> <li>• Fraud prevention</li> <li>• Marketing</li> <li>• Legal compliance</li> </ul>
Inferences drawn from any of the information identified in this chart to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	<ul style="list-style-type: none"> <li>• You directly, based on services purchased and preferences</li> <li>• Our marketing partners</li> </ul>	<ul style="list-style-type: none"> <li>• Customer relationship management</li> <li>• Data analysis</li> <li>• For marketing purposes</li> </ul>

For purposes of this Policy:

- information we collect “from you directly” includes: (i) personal information you provide to us, for example, when you: order and/or purchase services; provide us with your preferences; create an account; submit a form; interact with our customer service; and (ii) information we collect using online technologies when you use our website or the Cargologik App.
- our marketing partners include third-party data analytics providers and digital advertising partners (e.g., Google).

In addition to the above personal information, we also collect anonymous, de-identified, and/or aggregate data that is not linked to a particular individual. Our use or disclosure of such information is outside the scope of this privacy policy. We only maintain and use such data in a way that does not identify a particular individual, and we will not attempt to re-identify it, except to test our de-identification process and ensure it cannot be associated with any individual.

We collect your personal information for the following lawful bases:

Purpose	Lawful Basis
To enable access and navigation on the Sites and process data for the purpose of compiling statistics (on an anonymous basis) regarding the use of the Sites, supervise the correct functioning of the Sites, and ascertain liability in the event of illegal behavior during navigation on the Sites	We have a legitimate interest to properly manage and administer our relationship with you and to ensure that we are as effective and efficient as we can be
To provide registration service on the Sites	To manage and perform our contract with you; we have a legitimate interest to properly manage and administer our relationship with you and to ensure that we are as effective and efficient as we can be
For fraud prevention and detection and to comply with applicable laws, regulations, or codes of practice	To comply with our legal obligations
To facilitate your shipment and communicate with you about the services you have ordered from us or your relationship with us and to resolve complaints	To manage and perform our contract with you and any relevant insurer; we have a legitimate interest to respond to your requests and inquiries for ongoing business administration
For our own management information purposes, maintaining records, analysis of financial records, and internal audit	We have a legitimate interest in our ongoing business administration

To recommend services that may be of interest to you	With your consent, which you can withdraw at any time
To record telephone communications for the purposes of monitoring our customer service standards, for training, and for security purposes	We have a legitimate interest in the prevention and detection of fraud to ensure that your identity and transactions are secure, ongoing business administration, and improving our customer experience
To provide and administer the Cargologik App	With your consent, which you can withdraw at any time

**PERSONAL INFORMATION WE DISCLOSE AND WHY**

The personal information we disclose about you depends on how you interact with us. For example, if you facilitate a shipment through us, we may share your personal identifiers such as your name, email address, postal address, payment information, and Internet Protocol address with entities that help us process and fulfill shipments, answer questions about our services, manage our relationship with you, or with our marketing partners. Even if you do not engage us, we may disclose information with our marketing partners. The below chart summarizes how we have disclosed personal information in the last 12 months, and why.

<b>Personal Information We Collect</b>	<b>To Whom We Disclose It</b>	<b>Why We Disclose It</b>
Identifiers and contact information such as a real name, alias, postal address, Internet Protocol address, email address, and account name.	Shipping service providers, technical support service providers, customer service providers, payment partners, data analytics service providers, marketing partners, fraud prevention service providers, and transaction processors.	Fulfilling or processing your order, such as processing your payment, providing you with customer service, maintaining the Sites, marketing to you, preventing fraud, and analyzing our Sites' performance.
Categories of personal information described in Cal. Civ. Code § 1798.80(e) (e.g., telephone number).	Customer service providers, data analytics service providers, marketing partners, and transaction processors.	Customer service, data analytics, marketing, and transaction processing purposes.
Commercial information, including records of personal property; products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies.	Customer service providers, data analytics service providers, marketing partners, payment partners, and transaction processors.	For customer service, advertising, data analytics, marketing, and transaction processing purposes.

Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an Internet website, application, or advertisement.	Data analytics service providers and marketing partners.	For data analytics and marketing purposes.
Geolocation data.	Order fulfillment service providers, customer service providers, data analytics service providers, and marketing partners.	For order fulfillment, customer service, data analytics, and marketing purposes.
Professional or employment-related information (e.g., current employer, job title).	Shipping service providers, customer service providers, data analytics service providers, and marketing partners.	For order fulfillment, account creation, customer service, data analytics, and marketing purposes.
Audio, electronic, visual, thermal, olfactory, or similar information.	Data analytics service providers and marketing partners.	Customer service purposes, preventing fraud, and analyzing our Sites’ performance.
Inferences drawn from any of the information identified in this chart to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Data analytics service providers and marketing partners.	For data analytics and marketing purposes.

We may also disclose the above personal information in the event of a corporate transaction (e.g., a sale, merger, financing), as requested by you, or for legal purposes (e.g., as required to do so by law, or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect or defend our rights, interests or property or that of other customers or users, (iii) act in urgent circumstances to protect the personal safety of users of the Sites or the public or (iv) protect against legal liability or potential fraud, in each case as determined in our sole discretion).

We do not sell your personal information, nor do we collect sensitive personal information as defined by applicable laws.

**DIGITAL TECHNOLOGIES**

We and our marketing partners use various online tracking technologies to gather information about you when you interact with the Sites, email communications, or other websites, apps, or advertisements. These online tracking technologies may include technologies such as cookies (a piece of information placed on your browser when you access the Sites), web or hardware beacons (small pieces of data embedded in images and webpages), pixel tags, log files, local shared objects, and similar technologies (collectively, “online tracking technologies”).

When you visit certain websites or use an app (including our Sites), the online tracking technologies may collect identifiers (e.g., your Internet Protocol address or other online or device identifier), categories of

personal information described in Cal. Civ. Code § 1798.80(e), Internet or other electronic network activity information (e.g., a record of your usage of our Sites or engagement with other content, and the time of your usage), geolocation data (e.g., your approximate location), and inferences about you. Such information is collected passively using online tracking technologies, both on our Sites and on other third-party sites you visit or whose products or services you use.

We use the information gathered via these online tracking technologies to maintain and optimize our Sites (e.g., improving security, fixing bugs, preventing website crashes), understand traffic and usage patterns, associate information with a particular user or device, personalize your experience (e.g., saving preferences), track other websites you visit or other online activity, and for marketing purposes (e.g., tailoring our marketing efforts). Our partners (e.g., Google) may also supplement this data with the same or similar categories of personal information they have collected about you.

### Cookies

We may use a variety of cookies on the Sites. Cookies may be session cookies (i.e., last only for one browser session) or persistent cookies (i.e., continue in your browser until they are deleted or expire). Some of the cookies we use may be flash cookies or Adobe cookies, which may contain demographic information and depending on your browser, these cookies may not normally be deleted when your cookies are deleted. Please check your browser to determine where these types of cookies are stored and how they may be deleted. Among other cookies, we use Google Analytics. You can learn more about how those cookies work by visiting “How Google uses information from sites or apps that use our services,” located at <https://policies.google.com/technologies/partner-sites>. You may install a Google Analytics Opt-out Browser Add-on by visiting <https://tools.google.com/dlpage/gaoptout>.

You can learn more about cookies, see what cookies have been set on your computing device, and learn how to manage and delete them by visiting <http://allaboutcookies.org>.

While we recommend that you leave cookies turned on, as they allow you to take advantage of some of the features of the Sites, you have the ability to control our cookies. Specifically, you can configure your browser settings to (i) receive notifications when you are receiving new cookies, (ii) disable cookies, or (iii) delete cookies. Please refer to your Web browser's help section for information on how to do this. Depending on where you live, you can also choose whether or not to accept cookies by using the cookie banner found on our Sites. If you elect not to allow cookies to be placed, you may not be able to use or to enjoy all of the services and features of the Sites.

### **YOUR CHOICES**

#### Privacy Requests

Your rights and choices vary by the jurisdiction in which you reside. Generally, Cargologik provides residents of the U.K., Australia, Canada, China, Colombia, Mexico, California, Colorado, Connecticut, Utah, and Virginia the ability to:

- Know the information being processed about them;
- Access their personal information, including receiving a copy in a portable format;

- Correct inaccurate personal information;
- Delete certain personal information (this includes U.K. and Canadian residents' right to object, restrict, or withdraw consent, to the processing of their personal information); and
- Not be discriminated against for exercising their privacy rights.

Exceptions apply to all of these rights, but if we deny your request, we will tell you why. You can also correct and/or delete personal information by logging into your Cargologik account. You may delete your Cargologik account at any time by contacting Support at the email address listed directly below.

Eligible consumers, and authorized agents for California residents, may submit privacy requests by emailing us at [privacy@cargologik.com](mailto:privacy@cargologik.com).

When we receive a request to know, access, correct, cease processing, or delete your personal information, we must first verify your identity. We will take commercially reasonable steps to do so, including verifying you via your existing password-protected account or asking you to provide us with information matching the information we already have about you, such as by identifying a recent service you've purchased from us, the dollar amount of a recent shipment, or other such historical information about your shipments with us. If you wish to designate an authorized agent to make a request on your behalf, the agent should indicate that when submitting your request. We will then verify your authorized agent's permission to act on your behalf, including by requiring that they provide a written authorization to do so.

There may be circumstances in which we need not grant your privacy request. For example, we are not required to delete personal information needed to complete the transaction for which the personal information was collected (such as facilitating a shipment), to detect fraudulent or illegal activity, for bookkeeping or tax purposes, or for legal purposes. Also, we are not required to provide access, correction, or deletion where your identity could not be verified, where the information would compromise others' privacy or other legitimate rights, like intellectual property rights, or where the information contains legally privileged material. If we determine that your request should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries.

If you are a Colorado, Connecticut, or Virginia resident and we deny your privacy request, you may appeal our decision by contacting us in any of the ways listed in the "Contact Us" section below.

#### Managing Your Communication Preferences

***Email.*** To stop receiving promotional emails, click the "unsubscribe" link in any of our marketing emails or adjust your email preferences in your Cargologik account.

***App Push Notifications.*** To adjust your notifications, please adjust your selections in the Cargologik App's "Notification Settings."

#### **COMPLAINTS**

If you have any concerns about our use of your personal information, please contact us using the methods in the "Contact Us" section below so we can help make it right. If you are unhappy about how

we resolve your issue, you also have the right to complain to your local privacy regulator. Selected regulators' contact information is shown below.

- In the U.K., the regulator is the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)), which you can call at 0303 123 1113.
- In Colombia, the regulator is the Superintendent of Industry and Commerce, which you can call at 01 8000 910165.
- Connecticut residents who have their privacy rights appeal denied can contact their Attorney General via email at [attorney.general@ct.gov](mailto:attorney.general@ct.gov).
- Colorado residents with concerns over how their privacy rights appeal was handled can contact their Attorney General at 720-508-6000 or [here](#).

### **DOCUMENT RETENTION**

We retain personal information for as long as needed or permitted for the purpose(s) for which we obtained it, and as consistent with applicable law. The criteria used to determine our retention periods include:

- How long the personal information is needed to provide our services and operate our business;
- The type of personal information collected;
- How recently you made a purchase from us;
- Whether you have an account with us;
- Whether we are legally or contractually required to maintain your information for a certain period of time; and
- Other legal considerations (e.g., statutes of limitations).

### **NON-UNITED STATES RESIDENTS**

Please note that by using the Sites or otherwise engaging with us, you will be sending information (including personal information) to the United States where our servers are located. We will hold and process your personal information in accordance with privacy laws in the United States and this Policy. Please note that privacy laws in the United States may not be the same as, and in some cases may be considered less protective than, privacy laws in other countries. Therefore, by providing your personal information, you consent to the use of your personal information for the uses identified in this Policy and to the transfer of your personal information to the United States. Any transfer of U.K. consumer data to the United States is done according to the established Standard Contractual Clauses for international data transfers. Additional detail can be obtained by contacting us as described in the "Contact Us" section.

You may also have additional privacy rights based on your country's privacy laws. See the "Your Choices" section of this Policy for more information.

### **HOW WE PROTECT YOUR PERSONAL INFORMATION**

Although no website, app, platform, or business is 100 percent secure, the security and confidentiality of your personal information is important to us. We have implemented administrative, technical and



physical controls designed to safeguard your personal information. We use various security measures, including encryption technology, to protect information collected, transferred and retained. If you elect to set up an account on the Sites, you will be asked to provide an email address and password. You must provide a valid email address and password in order to create and maintain an account, as well as to access account information. We recommend that you select a password with at least 8 characters and consider adding numbers or special characters to further strengthen your password. In order to help protect your personal information, you should be careful about providing your password to others, and you should change your password periodically. If you wish to update a password or learn more about how we safeguard your information, or if you become aware of any loss, theft or unauthorized use of a password, please contact us at [privacy@cargologik.com](mailto:privacy@cargologik.com).

### **LINKS TO THIRD-PARTY WEBSITES**

The Sites may contain links to other websites not operated or controlled by us (the "Third-Party Sites"). The policies and procedures set forth herein do not apply to any Third-Party Sites. The owners and operators of all Third-Party Sites are responsible for all personal information provided, collected, maintained, stored, or otherwise disclosed on those sites, if any. The links on the Sites do not imply that we endorse or have reviewed the Third-Party Sites, including their privacy policies, if any. We strongly encourage contacting those sites directly for information on their privacy policies.

Similarly, if you use a social media platform or your mobile device (or other method of communication), including to interact with the Sites or otherwise engage with us or others online, that platform or application may have a specific privacy statement that governs the use of personal information related to it. If you have questions about the security and privacy settings of your device, please refer to instructions from your mobile service provider or the manufacturer of your device to learn how to adjust your settings. We do not control the data collection or privacy practices of any third-party platform through which you access our Sites or contact us. You should review the privacy policy and terms of use of any third-party site before using or downloading any app or device and review and use available controls and settings on your device to reflect your preferences.

### **CHILDREN**

The Sites are not directed at nor intended for use by children. We do not knowingly collect or intend to collect personal information from anyone who is under the age of 13. If you are under the age of 13, you should not provide any personal information to us. If you have reason to believe that a child under the age of 13 has provided personal information to us, please contact us and we will endeavor to delete that information from our databases.

### **CONTACT US**

If you have any questions about this Policy, our practices, or your privacy rights, please contact our Privacy Officer. You may also contact us at [privacy@cargologik.com](mailto:privacy@cargologik.com) and/or through mail at the following address: 95 Merrick Way, 3<sup>rd</sup> Floor, Coral Gables FL, 33134.

### **PRIVACY POLICY UPDATES**

The Sites and our business may change from time to time, and we may make corresponding changes to this Policy. We reserve the right to update, change, amend or modify this Policy at any time and from

time to time without prior notice. Please review this policy periodically, and especially before you provide any personal information.

If we make any material changes to this Policy (as determined by us), we will post a notice on the Sites notifying users of the changes and may provide an opportunity for you to take action relative to those changes prior to their implementation, if appropriate. In some cases, we also may send an email notifying registered users of upcoming changes.

This Policy was last updated on the date indicated below. Your continued use of the Sites after any changes or revisions to this Policy become effective shall indicate your agreement with the terms of such revised and then-current Policy.

**EFFECTIVE DATE**

This privacy policy is effective June 01, 2023, and was last updated on June 01, 2023.