

## **USER PRIVACY STATEMENT**

Effective as of October \_\_, 2016

TruckPay Inc. ("TruckPay", "we" or "us") collects information about you when you use our mobile applications, websites, and other online products and services (collectively, our "Services") and through other interactions and communications you have with us. This Privacy Statement (this "Statement") applies to persons anywhere in the world who use our Services ("Users"), whether that person is using our Services to find a job (a "Driver") or using our Services to find another person to complete a job (a "Lister").

### **Collection of Information**

#### Information You Provide to Us

We collect information you provide directly to us, such as when you create or modify your account, request on-demand services, contact customer support, or otherwise communicate with us. This information may include: name, email, phone number, postal address, profile picture, payment method, items requested (for delivery services), delivery notes, and other information you choose to provide.

#### Information We Collect Through Your Use of Our Services

When you use our Services, we collect information about you in the following general categories:

*Transaction Information.* We collect transaction details related to your use of our Services, including the type of service requested, date and time the service was provided, amount charged, distance traveled, and other related transaction details.

*Financial Information.* TruckPay uses Plaid Technologies, Inc. ("Plaid") to gather Users' data from financial institutions. By using our Services, you grant TruckPay and Plaid the right, power and authority to act on your behalf to access and transmit your personal and financial information from the relevant financial institution. You agree to your personal and financial information being transferred, stored and processed by Plaid in accordance with the Plaid Privacy Policy, which can be found at <https://plaid.com/legal>.

*Location Information.* We collect precise location data about the trip from the

TruckPay app whenever it is used by a Lister or a Driver. If you permit the TruckPay app to access location services through the permission system used by your mobile operating system (your “mobile platform”), we may also collect the precise location of a Driver’s device when the app is running in the foreground or background. We may also derive your approximate location from your IP address.

*Usage and Preference Information.* We collect information about how you and site visitors interact with our Services, including information about your usage patterns, preferences expressed, and settings selected. In some cases, we collect information through the use of “cookies”, tracking pixels, and similar technologies to understand how you navigate through the TruckPay app and to save your preferences. Cookies are small text files that web servers place on your device; they are designed to store basic information and to help websites and apps recognize your browser. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be accessed every time you use the TruckPay app.

*Device Information.* We may collect information about your mobile device, including, for example, the hardware model, operating system and version, software and file names and versions, preferred language, unique device identifier, advertising identifiers, serial number, device motion information, and mobile network information.

*Call and SMS Data.* Our Services facilitate communications between Listers and Drivers. In connection with facilitating this service, we receive call data, including the date and time of the call or SMS message, the parties’ phone numbers, and the content of the SMS message.

*Log Information.* When you interact with the Services, we collect server logs, which may include information like device IP address, access dates and times, app features or pages viewed, app crashes and other system activity, type of browser, and the third-party site or service you were using before interacting with our Services.

*Other Sources.* We may also receive information from other sources and combine that with information we collect through our Services. For example, if you choose to link, create, or log in to your TruckPay account with a payment provider (e.g., Google Wallet) or if you engage with a separate app

or website that uses our API (or whose API we use), we may receive information about you or your connections from that site or app.

### **Use of Information**

We may use the information we collect about you to:

- Provide, maintain, and improve our Services, including, for example, to facilitate payments, send receipts, provide products and services you request (and send related information), develop new features, provide customer support to Users and Drivers, develop safety features, authenticate users, and send product updates and administrative messages;
- Perform internal operations, including, for example, to prevent fraud and abuse of our Services; to troubleshoot software bugs and operational problems; to conduct data analysis, testing, and research; and to monitor and analyze usage and activity trends;
- Send or facilitate communications (i) between a Lister and a Driver, such as estimated times of arrival (ETAs), or (ii) between you and a contact of yours at your direction in connection with your use of certain features;
- Send you communications we think will be of interest to you, including information about products, services, promotions, news, and events of TruckPay and other companies, where permissible and according to local applicable laws; and to process contest, sweepstake, or other promotion entries and fulfill any related awards;
- Personalize and improve the Services, including to provide or recommend features, content, social connections, referrals, and advertisements.
- We may transfer the information described in this Statement to, and process and store it in, the United States and other countries, some of which may have less protective data protection laws than the region in which you reside. Where this is the case, we will take appropriate measures to protect your personal information in accordance with this Statement.

### **Sharing of Information**

We may share the information we collect about you as described in this

Statement or as described at the time of collection or sharing, including as follows:

- With other Users to facilitate and allow them to fulfill your arrangement with them made using the Services;
- With third parties to provide you a service you requested through a partnership or promotional offering made by a third party or us; and
- With third parties with whom you choose to let us share information, for example other apps or websites that integrate with our API or Services, or those with an API or Service with which we integrate; and

We also may share your information:

- With TruckPay subsidiaries and affiliated entities that provide services or conduct data processing on our behalf, or for data centralization or logistical purposes;
- With vendors, consultants, marketing partners, and other service providers who need access to such information to carry out work on our behalf;
- In response to a request for information by a competent authority if we believe disclosure is in accordance with, or is otherwise required by, any applicable law, regulation, or legal process;
- With law enforcement officials, government authorities, or other third parties if we believe your actions are inconsistent with our User agreements, terms of service, or policies, or to protect the rights, property, or safety of TruckPay or others;
- In connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company;
- If we otherwise notify you and you consent to the sharing; and
- In an aggregated and/or anonymized form which cannot reasonably be used to identify you.

### **Analytics and Advertising Services Provided by Others**

We may allow others to provide audience measurement and analytics

services for us, to serve advertisements on our behalf across the Internet, and to track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs, and other technologies to identify your device when you visit our site and use our Services, as well as when you visit other online sites and services.

## **Your Choices**

*Account Information*—You may correct your account information at any time by logging into your online or in-app account. If you wish to cancel your account, please email us at support@TruckPay.com. Please note that in some cases we may retain certain information about you as required by law, or for legitimate business purposes to the extent permitted by law. For instance, if you have a standing credit or debt on your account, or if we believe you have committed fraud or violated our Terms, we may seek to resolve the issue before deleting your information.

*Access Rights*—TruckPay will comply with individual's requests regarding access, correction, and/or deletion of the personal data it stores in accordance with applicable law.

*Location Information*—We request permission for our app's collection of precise location from your device per the permission system used by your mobile operating system. If you initially permit the collection of this information, you can later disable it by changing the location settings on your mobile device. However, this will limit your ability to use certain features of our Services.

*Contact Information*—We may also seek permission for our app's collection and syncing of contact information from your device per the permission system used by your mobile operating system. If you initially permit the collection of this information, iOS users can later disable it by changing the contacts settings on your mobile device. The Android platform does not provide such a setting.

*Promotional Communications*—You may opt out of receiving promotional messages from us by following the instructions in those messages. If you opt out, we may still send you non-promotional communications, such as those about your account, about Services you have requested, or our ongoing business relations.

*Cookies and Advertising*—You can change the settings in your web browser or Mobile Platform to modify your cookie settings.

### **Changes to the Statement**

We may change this Statement from time to time. If we make significant changes in the way we treat your personal information, or to the Statement, we will provide you notice through the Services or by some other means, such as email. Your continued use of the Services after such notice constitutes your consent to the changes. We encourage you to periodically review the Statement for the latest information on our privacy practices.

### **Contact Us**

If you have any questions about this Privacy Statement, please contact us at [privacy@truckpay.com](mailto:privacy@truckpay.com).