

**RouteSmart Technologies, Inc.**  
**Information For California Consumers**

Last updated: April 2, 2024

**Notice to California Consumers:** This California Consumer Privacy Statement is intended to comply with the California Privacy Protection Act, which became effective January 1, 2020 ("CCPA") and to provide appropriate protection and care with respect to the collection and treatment of the personal information of California consumers that is subject to CCPA.

This Statement describes the categories of personal information that RouteSmart collects, where this information comes from, why RouteSmart collects this information, the Service Providers and other Third Parties with whom RouteSmart shares this information (and why), and confirmation that RouteSmart does not sell your personal information.

This Statement also outlines the rights of California consumers to their information and how you may exercise these rights. Please see our Privacy Statement available on [trust.routesmart.com](https://trust.routesmart.com) for more information on our general privacy practices.

**Your Rights Regarding Your Personal Information:**

You have following rights with respect to RouteSmart's collection and use of Personal Information.

1. You have the right to know what Personal Information we collect.
2. You have the right to know whether RouteSmart sells or otherwise shares Personal Information and with whom.
3. You have the right to object to the sale of your Personal Information.
4. You have the right to access the Personal Information that RouteSmart collects from you.
5. You have the right to equal service from RouteSmart, whether or not you exercise the rights stated above.

**Categories of Personal Information that RouteSmart collects:**

"Personal Information" is any personal information about one of our users which could, alone or together with other information, could reasonably be used to identify them. Information such as a user name and password, an email address, a real name, and a photograph are examples of "Personal Information."

Categories of Personal Information that RouteSmart collects includes information necessary to create an account with us and to provide the RouteSmart services that you request, including for provision of support. This includes information such as your name, address, email address, telephone number and user name and password.

"Technical Information" may include information we collect from website browsers, such as web server logs, or other log information, such as user session or activity logs. Technical Information may be connected to Personal Information such as a username or an email address, or to other potentially personally-identifying information like Internet Protocol (IP) addresses. Please note that if even if you are just browsing the Site, RouteSmart will collect the same basic information that most websites collect. This includes the use of cookies. Please review our Cookie Policy available on [trust.routesmart.com](https://trust.routesmart.com).

Please see our Privacy Statement available on [trust.routesmart.com](https://trust.routesmart.com) for additional descriptions of the Personal Information that RouteSmart collects.

Personal Information does not include aggregated, non-personally identifying information. We may use aggregated, non-personally identifying information to operate, analyze, improve, and optimize our website and service.

**Information we collect from Service Providers and/or Third Parties:**

From time to time, RouteSmart receives personal information about individuals from third parties, including from our service providers. This may happen if you sign up for training or to receive information about RouteSmart from one of our vendors or business partners.

#### **Why we collect this information**

- We need your Personal Information to create your account, and to provide the RouteSmart services you request, or to respond to support requests.
- We use your Personal Information, specifically your user name, to identify you in connection with your use of the Site and our business dealings.
- To communicate with you for the purposes outlined in this Statement and in our Privacy Policy.
- We may use Personal Information and other data to make recommendations for you. These recommendations are automated decisions, but they have no legal impact on your rights.
- We collect Technical Information to better understand how our website visitors use the Site and RouteSmart services, and to monitor and protect the security of the Site.
- We collect Personal Information from Service Providers and other Third Parties for the purposes for which it was authorized to be collected.
- We use your Personal Information and Technical Information for internal purposes, such as to maintain logs for security reasons, for training purposes, and for legal documentation and compliance.
- We limit our use of your Personal Information to the purposes listed in this Privacy Statement. If we need to use your Personal Information for other purposes, we will ask your permission first.
- We **do not** intentionally collect **sensitive personal information**, such as social security numbers, genetic data, health information, or religious information. If you store any sensitive personal information on our servers, you are responsible for complying with any regulatory controls regarding that data.

#### **How we share the Personal Information we collect:**

- We **do** share Personal Information, so we can perform services you have requested or communicate on your behalf. For example, if you purchase products or services from us, we will share your account name with Service Providers, including our licensors, who facilitate our provision of such products and services.
- We **do not** share, sell, rent, or trade Personal Information with third parties for their commercial purposes, except where you have specifically authorized us to.
- We **do not** host advertising on the Site. We may occasionally embed content from third party sites and that content may include ads. While we try to minimize the amount of ads our embedded content contains, we can't always control what third parties show. Any Third Party advertisements on provided via the Site are not sponsored by, or tracked by, RouteSmart.
- We **do not** disclose Personal Information for purposes unrelated to RouteSmart's business and the products and services offered by RouteSmart, except as disclosed in this Statement and our Privacy Statement.
- We **do** share certain aggregated, non-personally identifying information with others about how our users, collectively, use RouteSmart, or how our users respond to our other offerings. However, we do not sell this information to advertisers or marketers.
- We **do** share Personal Information with Service Providers who process it on our behalf to provide or improve our service, and who have agreed to privacy restrictions similar to our own Privacy Statement by signing data protection agreements. Our vendors perform services such as payment processing, customer support ticketing, network data transmission, and other similar services. These Service Providers may process data outside of the United States.
- We **do** share aggregated, non-personally identifying information with Third Parties.
- We **may** share Personal Information if we are involved in a merger, sale, or acquisition.

#### **Public information Available Through the Site:**

- If your content is public-facing, Third Parties may access and use it in compliance with our Terms of Service, such as by viewing your profile. We do not sell that content, however, we do allow Third Parties, such as research organizations or archives, to compile public-facing RouteSmart information. Other Third Parties, such as data brokers, have been known to scrape RouteSmart and compile data as well. Your Personal Information, associated with your content, could be gathered by Third Parties in these compilations of RouteSmart data.

#### **How you can access and control the information we collect:**

- If you're already a RouteSmart account holder, you may access, update, alter, or delete your basic user profile information by editing your user profile or contacting RouteSmart. You can control the information we collect about you by limiting what information is in your profile, by updating out of date information, or by contacting RouteSmart.
- If RouteSmart processes information about you and you do not have an account, then you may access, update, alter, delete, or object to the processing of your Personal Information by contacting RouteSmart.

**Data portability:**

- You may always take your data with you. You must file a request for a copy of your data by using the procedures described below.

**Data retention and deletion of data:**

- Generally, RouteSmart will retain Personal Information for as long as your account is active or as needed to provide you services.
- We may retain certain Personal Information indefinitely, unless you delete it or request its deletion. For example, we don't automatically delete inactive user accounts, so unless you choose to delete your account, we will retain your account information indefinitely.
- We will retain and continue to use your Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements, but barring legal requirements, we will delete your full profile (within reason) within \_\_\_ days. You may contact RouteSmart to request the erasure of the data we process on the basis of consent within 30 days following deletion of your account.
- After an account has been deleted, certain data, will remain until deleted in accordance with our customary retention policies. However, we will delete or deidentify your personal information, including your user name and email address.

**How we respond to compelled disclosure:**

- RouteSmart may disclose Personal Information or other information we collect about you to law enforcement in response to a valid subpoena, court order, warrant, or similar government order, or when we believe in good faith that disclosure is reasonably necessary to protect our property or rights, or those of third parties or the public at large.
- In complying with court orders and similar legal processes, RouteSmart strives for transparency. When permitted, we will make a reasonable effort to notify users of any disclosure of their information, unless we are prohibited by law or court order from doing so, or in rare, exigent circumstances.
- We may disclose personally-identifying information and other information that we collect about you in connection with a sale of our business and/or business assets, including in the unlikely event of a bankruptcy or insolvency proceeding.

**How you may request information regarding your rights:**

You may request information regarding your rights by calling us at: 1.410.290.0226 or emailing us at: info@rousmart.com .

Upon your reasonable request and verification of your identity, we will disclose the following information regarding our collection practices:

1. We will disclose the different categories of Personal Information that we collect and the sources for each category of Personal Information.
2. We will disclose whether we sell your personal information or otherwise disclose it. RouteSmart currently does not sell your Personal Information. It is disclosed only for the purposes described above.

You may use this contact form to send us your questions or requests regarding your rights under this Statement or any other privacy-related issue.