

**RouteSmart Technologies, Inc.**  
**Privacy Statement**

Last Updated: April 2, 2024

**RouteSmart values your privacy.**

This Privacy Statement of RouteSmart Technologies, Inc., for itself, parent, subsidiaries and affiliated companies (collectively, "Company" "we" "us" or "our") outlines how your personally identifiable information and other personal data (your "user information") will be collected, used, and shared in connection with your access to and/or use of our websites, currently available at [www.routesmart.com](http://www.routesmart.com) and any content, features, services, or other offerings that Company may provide in connection therewith (collectively, the "Site"). This Privacy Statement also describes your choices and rights regarding the use, access and correction or deletion of your user information. By using the Site, you consent to the collection and use of your user information in accordance with this Privacy Statement.

Notice to EU Residents: this Privacy Statement and its enumerated policies are intended to comply, where applicable, with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (as amended and revised, the "General Data Protection Regulation" or "GDPR") and provide appropriate protection and care with respect to the treatment of your personal data, in accordance with the GDPR. The Company is the controller of your personal data. Please visit [trust.routesmart.com](http://trust.routesmart.com) to view information applicable to the rights of EU residents under GDPR.

Notice to California Consumers: This 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. Please visit [trust.routesmart.com](http://trust.routesmart.com) to view additional information applicable to the rights of California consumers under the CCPA.

**Summary**

To enhance, personalize, and support your experience on the Site, among other things, we collect, use, and share your user information. For example, we use aggregated information to develop content targeted to user interests and to generally improve the Site's user experience. As detailed below, your user information may also be used by Company and its partners to track your preferences, analyze traffic, and provide similar services and content. Company is committed to your privacy and will not share any user information with any third party without your consent, except as outlined in this Privacy Statement or as permitted by law. If you have any requests, comments, or questions about this Privacy Statement or your user information, please contact us in the manner provided below.

**What this Privacy Statement Covers**

This Privacy Statement covers the Site and our other media channels, such as any of our mobile applications and applies only to information we collect. This Privacy Statement does not apply to the activities of Company or any third party that may collect your user information while accessing or using such third party's services in connection with your use of our Site. While you may encounter links on the Site to other websites, please note that these websites are not covered by this Privacy Statement, unless otherwise noted. To learn more about such third party policies, we encourage you to read and review the privacy statements of each third party service that you may choose to use in connection with the Site.

As a general reminder, please think carefully before you decide to put anything on the internet. We are not responsible for the personally identifiable information or other user information you may choose to submit in any public forums that we may offer through the Site, or through any third party links available through the Site. To request removal of your personal information from any of our public forums, please contact us as provided below. In some cases, we may not be able to remove personal information voluntarily disclosed by you in such forums for legal retention purposes or technical limitations (e.g., the data may not be searchable), in which case, we will notify you if we are unable to do so.

**Gathering of Information**

**Section Overview:** We collect user information when you use the Site. Sometimes you may submit it to us yourself, other times it may be collected automatically. You can manage and change your preferences as outlined below.

## **Information Collected**

When you use the Site, your user information may be collected, used, and shared in a variety of manners. As detailed below, the type of user information collected may vary based on how it was gathered, but may include, among other things, your name, email address, and other information that you voluntarily submit (e.g., when setting up an account or submitting a registration or application on the Site, you may submit your contact information), information automatically collected about your usage of the Site (e.g., the content that you choose to view), and information about you that our third party partners may share with us.

## **Voluntary Submission**

Company may collect user information that is voluntarily provided by you or with your permission. For example, we may ask you for information, such as your e-mail address, when you register your account with the Site. In connection with services you request, we may request additional personal information, such as your address, telephone number and credit card or other payment information, in order to complete the purchase. You always have the option not to provide the information we request. If you choose not to provide the information we request, you can still visit many portions of the Site, but you may be unable to access certain options and services. When you register an account through the Site or provide information to Company in any other manner, you agree to provide only true, accurate, current and complete information.

## **Cookies**

A cookie is a small data file that is written to your computer's hard drive by your web browser. A cookie file can contain and/or automatically collect information, such as a user identification code or IP address, that a website will use to track the pages and number of times you have visited. The data read from these cookies may be linked to personally identifying (PII) and non-personally identifying (non-PII) information. Please view RouteSmart's cookie policy at [trust.routesmart.com](http://trust.routesmart.com).

## **Use of Your Information**

**Section Overview:** Our primary goal in collecting, using, and sharing user information is to enhance your experience on the Site, support the Site, and improve its features, performance, and other elements. Your user information may be used for the purposes outlined below. We will not use your user information without a valid legal basis to do so.

### **To Target Content**

To develop and provide content and advertising to you that is targeted to your interests, we use the analytics collected by the systems described above to determine which areas of the Site you prefer based upon the frequency of your visits and engagement with those areas. We may make reasonable assumptions based on your browser provided data to target relevant content and advertising to you on our Site and elsewhere where we may be acting as a 3rd party. We may also make reasonable geographic and demographic assumptions based on your presented IP address to target relevant content and advertising.

### **To Provide Interactive Communications from the Site**

To enhance your experience we may provide you with interactive communications, using the e-mail address that you provide to us. Such interactive communications are provided only to those users who have expressly provided us with their permission to receive them. From time to time we may provide e-mails highlighting new features available through the Site to those users who have expressly provided us with their permission to send such communications.

### **To Provide Communications with Third Parties (including to Data Processors)**

We respect the privacy of our users and will not disclose or distribute your information to any third party, except as provided for in this Policy.

## **Sharing of Information**

You may be requested to voluntarily provide certain user information during your use of the Site. If you choose to do so, that user information may be shared with Company as well as business partners and vendors providing hosting and other services for Company. This includes information shared with Data Processors.

We use third parties to provide credit card processing, e-mail service providers and hosting services on the Site.

When you sign up for such services, we will share your user information only as necessary for the third party to provide that service. These third parties are prohibited from using your user information for any other purpose. With respect to credit card processing, we do not collect, store, or process any credit card information.

The Site includes widgets and/or interactive mini-programs that run on the Site. These features are small content modules that users can embed on sites and may collect your IP address, which page you are visiting on our site, or set a cookie to enable the feature to function properly. These features are either hosted by a third party or hosted directly on the Site. Your interactions with these features are governed by the privacy policy of the company providing it.

### **Information Shared with Third Party Providers (including Data Processors)**

We may hire other companies to provide limited services on our behalf, such as processing transactions, or performing statistical analysis of our services. We will only provide those companies the information they need to deliver the service. In some instances, these companies may collect information directly from you. In these cases, you will be notified of the involvement of the external service provider. In all cases, these companies are subject to agreements that require them to maintain the confidentiality of your information and they are prohibited from using that information for any other purpose.

### **In the Event of Sale or Bankruptcy**

The ownership of the Site may change at some point in the future. Should that occur, we want this site to be able to maintain a relationship with you. In the event of a sale, merger, public offering, bankruptcy or other change in control of Company, your information may be shared with the person or business that owns or controls this site. Opting out of receiving information from third parties will not affect our right to transfer your information to a new owner, but your choices will continue to be respected regarding the use of your information. You will be notified as described below in "How will I know if the Privacy Statement is changed."

### **As Required By Law**

Company may disclose your personal information if required to do so by law such as to comply with a subpoena or in the good faith belief that such action is necessary to conform to the edicts of the law, protect your safety or the safety of others, investigate fraud or comply with a judicial proceeding, court order or legal process served on Company or to protect and defend the rights or property of Company.

### **Security**

**Section Overview:** We care about the protection of your user information and use industry standard safeguards to do so. Of course, it's important to keep in mind that no data transmission on the Internet is guaranteed to be 100% secure.

Your information is stored on Company servers located in the United States. We use industry standard physical, electronic, and organizational safeguards to protect your user information against loss or theft as well as unauthorized access and disclosure to protect your privacy. We treat data as an asset that must be protected against loss and unauthorized access. We employ many different security techniques to protect such data from unauthorized access by users inside and outside the company. However, "perfect security" does not exist on the Internet. If you are concerned that your privacy may have been breached, please contact us as provided below.

### **Privacy of Children**

If you are less than 18 years old, please do not send any user information to us--including information such as your name, address, or e-mail address. We do not knowingly collect (nor do we wish to collect) any personally identifiable information or other user information from children under the age of 18. In the event that we learn we have collected any personal information from a child under the age of 18, we will delete that information from our database and terminate the corresponding account, if any.

### **California Privacy Rights**

Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, certain information with respect to the types of personal information the business shares with third parties for direct marketing purposes by such third party and the identities of the third parties with whom the business has shared such information during the

immediately preceding calendar year. To request a copy of the information disclosure provided by Company pursuant to Section 1798.83 of the California Civil Code, please contact [legal@routesmart.com](mailto:legal@routesmart.com) .

### **Cross-border Transfers**

**Section Overview:** Your user information may be transferred to other countries in connection with your use of the Site. If you access or use the Site outside of the United States, your user information will be transferred to our servers in the United States.

### **How Will I Know if the Privacy Statement Is Changed?**

If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Note on Translated Version(s): For your convenience, Company may make translated versions of this Privacy Statement available on the Site. In the event that the terms of any such translated version conflict with the terms of the English version, the terms of the English version of this Privacy Statement will control in all instances.