

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

Last updated: May 22, 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 with the California Privacy Rights Act, which became effective January 1, 2023 (“CPRA”) 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 and/or CPRA, as each may be amended or supplemented from time-to-time.

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.

CPRA applies to certain California residents (“Consumers”) from whom we collect Personal Information. Consumers do not include a natural person acting in the capacity of a contractor of RouteSmart or as an employee, owner, officer, or director of a RouteSmart contractor, to the extent such person’s Personal Information is collected within the context of the person acting in such role. Persons acting in those roles should review the RouteSmart Privacy Policy.

For the purposes of this Privacy Notice, “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, or as otherwise defined by the CCPA and/or CPRA.

Personal Information does not include information that is lawfully made available from government records, deidentified or aggregate information, or otherwise excluded from the scope of the CCPA or CPRA, as applicable.

The below outlines RouteSmart’s collection and disclosure of Personal Information in the preceding 12 months from the date this Privacy Notice was last reviewed.

**Your Rights Regarding Your Personal Information:**

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

You have the right to know the categories of Personal Information we collect and what specific Personal Information we collect

You have the right to know categories of sources from which personal information is collected

You have the right to know the business or commercial purpose for collecting personal information

You have the right to know the categories of third parties with whom we shared personal information

You have the right to know whether RouteSmart sells or otherwise shares Personal Information and with whom.

You have the right to object to the sale or other sharing of your Personal Information.

You have the right to access the Personal Information that RouteSmart collects from you.

You have the right to correct and, in some cases delete, Personal Information that RouteSmart collects from you.

You have the right to have a copy of your Personal Information that you have provided to us transferred to you or to another party in a structured, commonly used and machine-readable format. This only includes the personal data you have submitted to us.

You have the right to limit RouteSmart's use and disclosure of Sensitive Personal Information.

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 include:**

"Identifiers" such as name, postal address, Internet Protocol address, telephone number, email address, photograph or other similar identifiers. This also includes usernames and passwords, You provide this information when you request services from RouteSmart, including support services.

"Protected Classification Characteristics" under California or federal law such as age or gender.

"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 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. Please note that RouteSmart does not collect all information described above, as these are provided only as examples.

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.

**Use of Personal Information:**

Personal Information may be used for the purposes disclosed to Consumers at the time of collection in our general Privacy Policy and for the purposes of providing our services, communicating with Consumers. Personal Information may also be used or disclosed as otherwise permitted or required by applicable law.

**Sources of Personal Information:**

In the preceding 12 months since this Privacy Notice was last reviewed, RouteSmart receives Personal Information from your and from Third Parties, including from our Service Providers (as these terms are defined under the CPRA). 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 website and RouteSmart services, and to monitor and protect the security of the website.

We collect Personal Information and Technical 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 use your Personal Information and Technical Information to provide you with information regarding our various products and services.

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.

#### **Sharing of Personal Information:**

In the past 12 months, we have shared the Personal Information we collect as follows:

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 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 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 volume of ads our embedded content contains, we can't always control what third parties show. Any Third Party content or advertisements provided via the website 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 the Site, 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 Policy through execution of written contracts. 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.

#### **Sale of Your Information:**

We have not sold your Personal Information for the preceding 12 months from the date of the last review of this California Privacy Notice.

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

If information you provide is visible to other visitors or users of the website (i.e. public-facing), Third Parties may access and use it in compliance with our license agreements and other agreements, 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 30 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 username and email address. Please note that we will retain your deletion request for our internal records.

#### **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 1.800.977.7284 or emailing us at: [info@routesmart.com](mailto:info@routesmart.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.

Please be aware that we do not accept or process requests through other means.

#### **Verification Process:**

We will review the information provided and may request additional information to ensure we are interacting with the correct Consumer. If you have a password-protected online account with us, you may be required to log in to your account for identity verification. If you do not have an account with us, additional information to verify your identity may be required by law before we may act upon such a request. This additional information may vary depending on the nature of your request and/or the nature of the information about which your request relates. In some cases, we may also be required by law to obtain a signed declaration under penalty of perjury from you that you are the subject of the request being made. If we suspect fraudulent or malicious activity on or from your account, we will delay acting on your request until we can appropriately verify your identity and the request as authentic.

After submitting your request online, you will receive a follow-up email outlining the estimated amount of time it will take to complete your request and giving further instructions. That email may also include a link you must click on to verify your identity. If you do not click on that link, we will be unable to complete your request due to lack of verification. It is important that you provide a valid email address in order for us to be able to process your request.

By law, we are not required to collect Personal Information that we otherwise would not collect in the ordinary course of our business, retain Personal Information for longer than we would otherwise retain such information in the ordinary course of our business, or re-identify or otherwise link information that is not maintained in a manner that would be considered Personal Information. If we have not requested specific additional information from you to verify your request, please do not send such information.

We generally will aim to avoid requesting additional information from you for the purposes of verification. However, if we cannot reasonably verify your identity or more information is needed for security or fraud-prevention purposes, we may consider any of the following factors, alone or in combination, in requesting additional information:

The type, sensitivity, and value of the Personal Information collected and maintained about the Consumer, as applicable law requires a more stringent verification process for sensitive or valuable Personal Information.

The risk of harm to the Consumer posed by any unauthorized access or deletion.

The likelihood that fraudulent or malicious actors would seek the Personal Information.

Whether the Personal Information to be provided by the Consumer to verify their identity is sufficiently robust to protect against fraudulent requests or being spoofed or fabricated.

The manner in which we interact with the Consumer.

Available technology for verification; or

Other factors that may be reasonable in the circumstances, are consistent with industry practice, are recommended by California government officials, or which may be required by law or regulation following the effective date of this Privacy Notice

If your request is regarding a Consumer's household information, the same verification steps above may be required before we can provide you with aggregate household information. In addition, if you do not have a password-protected online account with us, for us to process a request for access to or deletion of specific pieces of information regarding your household, we may need all members of the household to make the request, and we may need to individually verify each household member and that each member making the request is currently a member of the house.

We reserve the right to charge a reasonable fee or take other appropriate action in response to requests from a Consumer or household that are manifestly unfounded or excessive, in particular because of their repetitive character.

#### **Denial of Deletion Requests:**

We may deny a deletion request if retaining the information is necessary for RouteSmart or our Service Providers to do the following:

Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.

Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

Debug products to identify and repair errors that impair existing intended functionality.

Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.

Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546).

Enable solely internal uses that are reasonably aligned with Consumer expectations based on your relationship with us.

Comply with a legal obligation; and/or

Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

#### **Authorized Agent Requests:**

Consumers may designate an authorized agent to make a request on your behalf pursuant to applicable law. We accept documentation of your designation in the form of a valid power of attorney and/or a written authorization signed by you and the authorized agent. You may submit evidence of your designation of an authorized agent in writing to RouteSmart, Attn: info@RouteSmart.com.

We may require verification of your authorized agent in addition to the information for verification above for Consumers and households.

**Non-Discrimination:**

RouteSmart will not discriminate against a Consumer for exercising any of your CCPA or CPRA rights. Unless permitted by the CCPA or CPRA, we will not deny your use of the RouteSmart website or portal or provide you with a different level or quality of services.

**Notice of Financial Incentive:**

RouteSmart does not offer financial incentives to Consumers based upon the collection or retention of a Consumer's Personal Information.

**Changes to Our Privacy Notice:**

We reserve the right to amend this Privacy Notice at our discretion and at any time. The date this Privacy Notice was last updated is identified at the top of this page. You are responsible for periodically visiting this Privacy Notice to check for any changes.

**Contact Us:**

If you have any questions or concerns regarding this Privacy Notice, contact [info@routesmart.com](mailto:info@routesmart.com).