

PRIVACY POLICY

Last updated July 04, 2023

This Privacy Policy describes how the “Site” or “we” collects, uses, and discloses your Personal Information when you visit or make a purchase from the Site.

1. CONTACT

After reviewing this policy, if you have additional questions, want more information about our privacy practices, or would like to make a complaint, please contact us by e-mail at support.edu@trucking42.com.

2. COLLECTING PERSONAL INFORMATION

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. We collect information that you provide to us, the information we obtain automatically when you use our Services, and information from other sources such as third-party services and organizations, as described below.

A. PERSONAL INFORMATION YOU PROVIDE TO US DIRECTLY

We may collect personal information that you provide to us.

Account Creation. We may collect personal information when you create an account, such as name, email address, username, phone number, gender, demographic information, etc.

- **Purchases.** We may collect personal information and details about your purchases, including payment information. Any payments made via our Services are processed by third-party payment processors. We do not directly collect or store any payment card information entered through our Services, but we may receive information associated with your payment card information (e.g., your billing details).

- **Your Communications with Us.** We may collect personal information, such as email address, phone number, or mailing address when you request information about our Services, register for our newsletter or loyalty and reward programs, request customer or technical support, apply for a job, or otherwise communicate with us.
- **Surveys.** We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the survey.
- **Interactive Features.** We and others who use our Services may collect personal information that you submit or make available through our interactive features (e.g., messaging and chat features, commenting functionalities, forums, blogs, and social media pages). Any information you provide using the public sharing features of the Services will be considered “public,” unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein.
- **Sweepstakes or Contests.** We may collect the personal information you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information about sweepstakes and contest winners.
- **Conferences, Trade Shows, and Other Events.** We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications.** We may post job openings and opportunities on our Services. If you respond to one of these postings, we may collect your

personal information, such as your application, CV, cover letter, and/or any other information you provide to us.

B. PERSONAL INFORMATION COLLECTED AUTOMATICALLY

We may collect personal information automatically when you use our Services.

- **Automatic Collection of Personal Information.** We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during, and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.

- **Cookie Policy (and Other Technologies).** We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, and other technologies (“Technologies”) to automatically collect information through your use of our Services.
- **Cookies.** Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
- **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary.** This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity, improve security, or allow you to make use of our functionality;
- **Performance-Related.** We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services (see Analytics below);
- **Functionality-Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed;
- **Advertising- or Targeting-Related.** We may use first-party or third-party Technologies to deliver content, including ads relevant to your interests, on our Services or on third-party digital properties.
- **Analytics.** We may use Technologies and other third-party tools to process analytics information on our Services. These technologies allow us to better understand how our Digital Services are used and to continually improve and personalize our Services. Some of our analytics partners include:
 - **Google Analytics.** For more information about how Google uses your personal information (including for its own purposes, e.g., for profiling or linking it to other data), please visit [Google Analytics Privacy Notice](#). To learn more about how to opt-out of Google Analytics' use of your information, please [click here](#).
 - **Hotjar (Session Replay Analytics).** We use Hotjar's session replay analytics services. This allows us to record and replay an individual's interaction with the Services. For more information about how Hotjar uses your personal information, please visit the "[Personal Data collected from a visitor of a Hotjar](#)"

Enabled Site” section of Hotjar’s Privacy Policy. To learn more about how to opt out of Hotjar’s use of your information, please click here.]

- Facebook Connect: For more information, please visit Facebook’s Data Policy. You can object to the collection of your data by Facebook pixel, or to the use of your data for the purpose of displaying Facebook ads by contacting the following address while logged into your Facebook account:
<https://www.facebook.com/settings?tab=ads>.
- Mixpanel: For more information about Mixpanel, please visit Mixpanel’s Privacy Policy.

C. PERSONAL INFORMATION COLLECTED FROM OTHER SOURCES

Third-Party Services and Sources. We may obtain personal information about you from other sources, including through third-party services and organizations. For example, if you access our Services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect personal information about you from that third-party application that you have made available via your privacy settings.

Referrals and Sharing Features. Our Services may offer various tools and functionalities that allow you to provide personal information about your friends through our referral service. Our referral services may also allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services. Please only share with us the contact information of people with whom you have a relationship (e.g., relative, friend, neighbor, or co-worker).

3. MINORS

The Services are not directed to children under 13 (or other ages as required by local law), and we do not knowingly collect personal information from children.

If you are a parent or guardian and believe your child has uploaded personal information to our Services without your consent, and you wish to review information collected from your child or have that information modified or deleted, you may contact us as described in “Contact Us” below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it, and terminate the child’s account, if applicable.

4. SHARING PERSONAL INFORMATION

We share your Personal Information with service providers to help us provide our services and fulfill our contracts with you, as described above. For example:

- We use Shopify to power our online store. You can read more about how Shopify uses your Personal Information here:
<https://www.shopify.com/legal/privacy>.
- We may share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant, or another lawful request for information we receive, or to otherwise protect our rights.

5. USING PERSONAL INFORMATION

We use your personal information to provide our services to you, which include: offering products for sale, processing payments, shipping and fulfillment of your order, and keeping you up to date on new products, services, and offers.

A. LAWFUL BASIS

Pursuant to the General Data Protection Regulation (“GDPR”), if you are a resident of the European Economic Area (“EEA”), we process your personal information under the following lawful bases:

- Your consent;
- The performance of the contract between you and the Site;
- Compliance with our legal obligations;
- To protect your vital interests;
- To perform a task carried out in the public interest;

- For our legitimate interests, which do not override your fundamental rights and freedoms.

B. RETENTION

When you place an order through the Site, we will retain your Personal Information for our records unless and until you ask us to erase this information. For more information on your right of erasure, please see the 'Your rights' section below.

C. AUTOMATIC DECISION-MAKING

If you are a resident of the EEA, you have the right to object to processing based solely on automated decision-making (which includes profiling), when that decision-making has a legal effect on you or otherwise significantly affects you.

We do not engage in fully automated decision-making that has a legal or otherwise significant effect using customer data.

Services that include elements of automated decision-making include:

- Temporary blacklist of IP addresses associated with repeated failed transactions. This blacklist persists for a small number of hours.
- Temporary blacklist of credit cards associated with blacklisted IP addresses. This blacklist persists for a small number of days.

6. SELLING PERSONAL INFORMATION

We disclose your personal information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. DISCLOSURES TO PROVIDE OUR SERVICES

The categories of third parties with whom we may share your personal information are described below.

- **Service Providers.** We may share your personal information with our third-party service providers that help us provide our Services. This includes service providers and vendors that provide us with IT support, hosting, payment processing, customer service, and related services.
- **Business Partners.** We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information with business partners with whom we jointly offer products or services.
- **Affiliates.** We may share your personal information with our brands and affiliates.
- **Rakuten Advertising** may collect personal information when you interact with our digital property, including IP addresses, digital identifiers, information about your web browsing and app usage and how you interact with our properties and ads for a variety of purposes, such as personalization of offers or advertisements, analytics about how you engage with websites or ads and other commercial purposes.
- **Advertising Partners.** We may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as “interest-based advertising” or “personalized advertising.”

B. DISCLOSURES TO PROTECT US OR OTHERS

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate

to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. DISCLOSURE IN THE EVENT OF MERGER, SALE, OR OTHER ASSET TRANSFERS

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

7. YOUR RIGHTS

Your Privacy Rights. In accordance with applicable law, you may have the right to:

- Access to and Portability of Your Personal Information, including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information; and (iii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company (the "right of data portability");
- Request Correction of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information;
- Request Deletion of your personal information;
- Request Restriction of or Object to our processing of your personal information; and
- Withdraw your Consent to our processing of your personal information.

GDPR

If you are a resident of the EEA, you have the right to access the Personal Information we hold about you, to port it to a new service, and to ask that your Personal Information be corrected, updated, or erased. If you would like to exercise these rights, please contact us through the contact information above.

Your Personal Information will be initially processed in Ireland and then will be transferred outside of Europe for storage and further processing, including to Canada and the United States.

CCPA

If you are a resident of California, you have the right to access the Personal Information we hold about you (also known as the 'Right to Know'), to port it to a new service, and to ask that your Personal Information be corrected, updated, or erased. If you would like to exercise these rights, please contact us through the contact information above.

If you would like to designate an authorized agent to submit these requests on your behalf, please contact us at the address above.

COOKIES

A cookie is a small amount of information that's downloaded to your computer or device when you visit our Site. We use a number of different cookies, including functional, performance, advertising, and social media or content cookies. Cookies make your browsing experience better by allowing the website to remember your actions and preferences (such as login and region selection). This means you don't have to re-enter this information each time you return to the site or browse from one page to another. Cookies also provide information on how people use the website, for instance whether it's their first time visiting or if they are a frequent visitor.

We use the following cookies to optimize your experience on our Site and to provide our services.

The length of time that a cookie remains on your computer or mobile device depends on whether it is a “persistent” or “session” cookie. Session cookies last until you stop browsing and persistent cookies last until they expire or are deleted. Most of the cookies we use are persistent and will expire between 30 minutes and two years from the date they are downloaded to your device.

You can control and manage cookies in various ways. Please keep in mind that removing or blocking cookies can negatively impact your user experience and parts of our website may no longer be fully accessible.

Most browsers automatically accept cookies, but you can choose whether or not to accept cookies through your browser controls, often found in your browser’s “Tools” or “Preferences” menu. For more information on how to modify your browser settings or how to block, manage or filter cookies can be found in your browser’s help file or through such sites as: [www.all aboutcookies.org](http://www.allaboutcookies.org).

Additionally, please note that blocking cookies may not completely prevent how we share information with third parties such as our advertising partners. To exercise your rights or opt-out of certain uses of your information by these parties, please follow the instructions in the “Behavioural Advertising” section above.

Do Not Track

Please note that because there is no consistent industry understanding of how to respond to “Do Not Track” signals, we do not alter our data collection and usage practices when we detect such a signal from your browser.

8. CHANGES

We may update this Privacy Policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal, or regulatory reasons.

9. Complaints

As noted above, if you would like to make a complaint, please contact us by e-mail or by mail using the details provided under “Contact” above.

If you are not satisfied with our response to your complaint, you have the right to lodge your complaint with the relevant data protection authority. You can contact your local data protection authority, or our supervisory authority here:

<https://ico.org.uk/make-a-complaint/>

10. CONTACT US

If you have any questions about our privacy practices or this Privacy Policy, or to exercise your rights as detailed in this Privacy Policy, please contact us at:

support.edu@trucking42.com.