

# PRIVACY POLICY

*Last Updated: September 20, 2021*

## **SCOPE OF THIS POLICY**

DispatchIt, Inc, a Delaware corporation (“Dispatch”, “we”, “us”, or “our”) has prepared this Privacy Policy (this “Policy”) to govern how we collect, use, maintain and disclose information that we collect from our users. Our “Users” includes anyone who accesses our website located at [www.dispatchit.com](http://www.dispatchit.com) and its related websites, as well as the Dispatch™ mobile application (collectively, the “Platform”). The services we provide through the Platform (the “Services”) allow one set of Users (sometimes called the “Shippers”) to request commercial delivery service from a different group of Users (sometimes called the “Drivers”). Due to the way we collect information, this Policy also applies to anyone accessing the Platform for other purposes (such as research or for information on our company).

## **OUR APPROACH TO PRIVACY**

When you use our Services or access the Platform, we will naturally collect information from and about you, your devices, and your interactions with Dispatch. Some of this information identifies you directly or can be used to identify you when combined with other data. The purpose of this Policy is to provide you with information on how we do so. It is our belief, however, that you own your data and have the right to control it. Our mission is to provide our Users with the tools and information they need to make informed choices about how we collect, store and use that data.

## **WHAT WE COLLECT**

Information we collect may include a User’s name and contact information, and with respect to the Drivers, a profile photo, rating, real-time location, and their vehicle make, model, color, and license plate.

## **HOW WE COLLECT YOUR INFORMATION**

When using the Services, you may be asked to provide personal information about yourself, such as your name, contact information, payment information, and home or business address. This may occur, for example, when you register on the Platform as a Driver or Shipper, or submit a delivery request as a Shipper to the Drivers through the Platform. We may combine this information with other information we collect from your interaction with the Services or from other companies. In particular, you might provide us with personal information as follows:

- **Account Sign-Up**. When you create an account on our Platform, we collect the information you provide us, such as your name, email address, phone number, birth date, and payment information. You may choose to share additional info with us for your account as well.
- **Driver Application and Profile**. If you apply to be a Driver, we will collect the information you provide in your application, including your name, email address, phone number, birth date, profile photo, physical address, government identification number (such as social security number), driver's license information, vehicle information, and car insurance information. We also collect the payment information you provide us, including your bank routing numbers and tax information. Depending on where you want to drive, we may also ask for additional business license or permit information. We may need additional information from you at some point after you become a Driver, including information to confirm your identity (like a photo) or (where applicable) to confirm the status of your business license or other permits.
- **Location Information**. The Platform, by necessity, collects and processes location information (including GPS and WiFi data). For Shippers, we collect your device's precise location when you open and use our mobile application to request Services, including while the app is running in the background. For Drivers, we collect your device's precise location whenever you mark yourself online and/or have been assigned or have accepted responsibility for a delivery. In order to ensure the safe delivery of all goods,

this tracking will continue while the app is running in the background or when you mark yourself offline if any delivery is incomplete.

- Usage Information. We collect information about your use of the Platform, including delivery information such as the date, time, destination, distance, route, and other logistical information. We also collect information about your interactions with the Platform, such as the pages and content you view and the dates and times of your use.
- Communications Between Drivers and Shippers. We collect information about any phone or text message communications, as well as in-application communications, exchanged between Drivers and Shippers, including the participants' phone numbers, the date and time, and the contents of SMS messages. For security purposes, we may also monitor or record the contents of phone calls made through the Platform or with our customer support team.

### **CHILDREN UNDER 16**

The Platform and our Services are not intended for children under 16 years of age and we do not knowingly collect or sell personal information from children under 16. No one under age 16 may provide any information to, on or through the Platform. If you are under 16, do not use or provide any information on the Platform or use any of the Services. If we learn we have collected or received personal information from a child under 16, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at: [privacy@dispatchit.com](mailto:privacy@dispatchit.com). Please note that this policy is what we consider our absolute minimum policy. We do not allow any person under the age of 23 to act as a Driver, and generally will not accept persons under the age of 18 to request Services as a Shipper.

### **TRACKING**

We use various technologies to collect information automatically when you access the Platform, including cookies, web beacons and other similar technologies. A cookie is a small text file that is stored in a user's computer for record keeping purposes. For example, when you access the

Platform or sign into our website or the Dispatch application, we may record your user ID, the name on your user or member account, your device ID, or other identifying information in the cookie file on your computer. We also may record your password in this cookie file, if you indicated that you would like your password saved for automatic sign-in. For security purposes, we will encrypt any usernames, passwords, and other user or member account-related data that we store in such cookies. In the case of sites and services that do not use a user or member ID, the cookie will contain a unique identifier. You may delete or decline cookies by changing your browser settings. (Click “Help” in the toolbar of most browsers for instructions.) If you do so, some of the features and services of our Platform may not function properly. Similarly, third parties may use cookies to deliver advertisements to you based on your visit to the Dispatch website or other websites. You may opt out of cookie tracking and analysis from any of these services providers and advertising networks, but doing so could impede your experience with our Platform.

The Platform may also include web beacons or pixels, which are electronic files to count users who have visited a certain page, to track activity over time and across different websites, to determine users’ interactions with emails we send, to identify certain cookies on the computer or other electronic device accessing that page, or to collect other related information, and this information may be associated with your unique browser, device identifier, or Internet Protocol address.

#### **MOBILE DEVICE AND MOBILE BROWSER INFORMATION**

You may adjust settings on your mobile device and mobile browser regarding cookies and sharing of certain information, such as your mobile device model or the language your mobile device uses, by adjusting the privacy and security settings on your mobile device. Please refer to the instructions provided by your mobile service provider or mobile device manufacturer. If you enable location services on your mobile device, Dispatch may collect the location of your device as described above.

### **DIGITAL USAGE LOGS**

We collect information about your use of our Services, including the type of browser you use, access times, pages viewed, your IP address and (in the case of our Dispatch website and mobile application) the page you visited before navigating to the Platform. We also collect information about the computer or mobile device you use to access our Services, such as the hardware model, operating system and version, unique device identifiers, mobile network information, and browsing behavior.

### **CALLS AND TEXT MESSAGES**

Calls between you and Dispatch may be recorded or monitored for quality assurance and customer service purposes. You will be notified at the beginning of a call if it may be recorded or monitored.

### **COLLECTION OF INFORMATION BY THIRD-PARTY SERVICES**

Some information you provide through the Services is collected and processed by third parties on our behalf. For example, when you sign up for Services, we collect your credit or debit card information; this information is shared with and processed by third party payment processors. Our third-party service providers include the following:

- In certain markets, we can outsource delivery services to third party logistics providers or independent driver networks maintained by our industry partners. In these cases, your personal information may be shared with the partner networks for purposes of providing you with the Services you have requested. This may include address and location information, phone numbers, names and email addresses.
- We utilize third party services to process payments you submit through the Platform. Use of these services requires us to share certain personal and financial information with those providers, which is subject to their privacy policies. By using our Services or signing up through the Platform, you grant Dispatch the right, power, and authority to transmit your personal and financial information to the third party processors. You agree to your personal and financial information being transferred, stored, and processed by

these providers. You may view their privacy policies online at

<https://www.ordwaylabs.com/privacy-statement> and <https://stripe.com/privacy>.

- When you sign up to be a Driver, we may perform criminal background or credit checks on you to ensure that you meet our Driver standards, and you agree to our sharing your personal information with our chosen vendors. To perform these checks, we utilize the service provided by Yardstick. Their privacy terms are available online at <https://yardstik.com/privacy-policy/>.
- We record customer names, email addresses, and phone numbers in our Customer Relationship Management system. Privacy terms are available online at <https://legal.hubspot.com/privacy-policy>
- We utilize third party systems for analytics and reporting and share usernames, email addresses, and phone numbers in order to de-duplicate this data.
- We utilize third party systems for infrastructure and application monitoring. Our applications log to these systems. This log data may contain usernames, email addresses, and phone numbers.

### **HOW WE USE YOUR INFORMATION – IN GENERAL**

We generally use information collected about you to provide and improve the Services, including to:

- Provide and deliver the Services, process transactions and send related information such as confirmations, delivery updates, and invoices;
- Send you technical notices, updates, security alerts and support and administrative messages;
- Respond to your comments, questions and requests and provide customer service and Driver support;
- Monitor and analyze trends, usage and activities in connection with our Services;
- Revise, modify, and update existing Services and develop new services;

- Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of Dispatch and others;
- Personalize the Services and present you with content or features that we believe will be of interest or useful to you;
- Link or combine with information we get from others to help understand your needs and provide you with better service; and
- Carry out any other purpose described to you at the time the information was collected.

### **HOW WE SHARE YOUR INFORMATION**

Your privacy is important to us, and we are committed to protecting information that identifies you personally. We will only share personal information that you provide to us in the following circumstances:

- **With your consent.** This happens when you submit your information through many of our Services. For example:
  - Driver information shared with Shippers: Upon a Driver accepting a delivery request, we will share with the Shipper the Driver's name, profile photo, rating, real-time location, and the vehicle make, model, color, and license plate, as well as other information in the Driver's profile.
  - Shipper information shared with Drivers: If you request delivery services from our independent driver network, then you are consenting to our disclosing your information to third parties, such as your identity, information regarding your company, your parcels, and your location.
- Partners with whom we conduct business. When Dispatch partners with other businesses to offer products and services, we may share information with those business partners only as needed to provide those products and services and only subject to the terms of this Policy. However, such partners may also independently collect your

information. See “Collection of Information by Third Party Services” for additional information.

- Legal obligation or protection from harm. When Dispatch has a good faith belief that access, use, preservation or disclosure of information is reasonably necessary to (a) satisfy any requirement of law, regulation, legal process, or enforceable governmental request, (b) enforce or investigate a potential violation of our Terms of Use, (c) detect, prevent, or otherwise respond to fraud, security or technical concerns, (d) support auditing and compliance functions, or (e) protect the rights, property, or safety of Dispatch, its users, or the public against harm.

We may also share aggregated or de-identified information that cannot reasonably be used to identify you.

### **INTEREST-BASED ADVERTISING**

We may participate in interest-based advertising. This means that when you use the Services, we or third party service providers or advertisers may use cookies or other similar technologies to collect information about your use of the Services (including mobile applications) or your online activities over time and across different websites and devices. Collected information may include the content you view, the date and time that you view this content, and the website that referred you to the Services, and this information may be associated with your unique browser, device identifier, or Internet Protocol (IP) address. These practices help tailor advertisements that are relevant and useful to you. These tailored advertisements may appear on the Platform or on other websites, applications or properties. In addition, if you have provided your email address to us, we may use a scrambled, unreadable form (a hash) of your email address to deliver tailored advertisements to you on the Services or on other websites.

### **THIRD-PARTY LINKS AND WEBSITES**

Throughout the Platform, we may link to the websites of other companies and/or individuals. Further, certain functionalities on the Platform may involve the distribution of your personal information to third-party websites. These third-party websites may collect information about



users on those websites, and this Policy does not extend to these external websites and third parties. Please refer directly to these third parties and websites regarding their privacy policies.

### **SECURITY AND RETENTION OF INFORMATION**

Dispatch takes reasonable steps to protect the information Users share with us from unauthorized use, access, and disclosure, both during transmission and at rest. However, no transmission of information via the Internet nor electronic storage solution can be entirely secure, so please be aware that we cannot guarantee absolute security. You can access, update, and delete personal information you provide to Dispatch in your account profile by logging into your account on the Platform. We may maintain a copy of the original version of your information in our records. We will retain your information for as long as necessary to fulfill the purposes outlined in this Policy unless a longer retention period is required or permitted by law.

### **TRANSFER OF INFORMATION TO THE UNITED STATES**

Dispatch is based in the United States and you acknowledge that the information we collect is governed by U.S. law. By accessing or using the Services or otherwise providing information to us, you consent to the processing, transfer, and storage of information in and to the United States, where you may not have the same rights and protections as you do under local law.

### **GOVERNMENT AND PRIVATE PARTY INFORMATION REQUESTS**

Dispatch may receive various forms of legal process from government agencies and private parties requesting information about our Users. Before we produce information, we will make a good faith attempt to notify affected Users and give them an opportunity to object unless notification is prohibited by law or if we believe that notification would create a risk of harm or be otherwise counterproductive.

### **EMAIL MANAGEMENT**

You may receive email from Dispatch for a variety of reasons - for example, if you took an action through the Services, you signed up for a regular report, or we are making you aware of system updates or new product or service offerings. If you have an account with Dispatch, you can

select your preferences through your account settings. Also, you can manage your receipt of some types of communication by following the instructions included in the emails we send you. Please note that, even if you unsubscribe from certain email correspondences, we may still need to email you with important transactional or administrative information.

### **YOUR CALIFORNIA PRIVACY RIGHTS**

This notice to California residents is provided under California law, including the California Consumer Privacy Act (“CCPA”), Cal. Civ. Code 1798.100, et seq. This notice adheres to the scope of this Privacy Policy by explaining California privacy rights, if you are a California resident, providing our notice at collection of personal data, and providing mandated disclosures about our treatment of California residents’ information will be addressed. To exercise these rights, please contact us as provided below under “How to Contact Us.” If the CCPA applies to Dispatch and to your profile, we will provide you with the following rights:

- **Right to Know.** You have the right to know and see what data we have collected about you over the past 12 months, including:
  - The categories of personal information we have collected about you;
  - The categories of sources from which the personal information is collected;
  - The business or commercial purpose for collecting your personal information;
  - The categories of personal information that we sold;
  - The categories of third parties with whom we have shared your personal information; and
  - The specific pieces of personal information we have collected about you.
- **Right to Delete.** You have the right to request that we delete any personal information we have collected from you, unless we need the information to:
  - Complete our pending transactions with you;
  - Provide you requested Services;
  - Protect your security and prosecute those responsible for breaching it; or
  - Make other internal and lawful uses of the information that are compatible with the context in which you provided it.

- **Other Rights.** You can request certain information about our disclosure of personal information to third parties for their own direct marketing purposes during the preceding calendar year. This request is free and may be made once a year. You also have the right not to be discriminated against for exercising any of the rights listed above. Our goal is to respond to all requests for information, access or deletion within 45 days of receipt.

### **Exercising Access, Data Portability, and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Emailing to: [privacy@dispatchit.com](mailto:privacy@dispatchit.com)
- Submitting a request form at

<https://dispatchit.wirewheel.io/privacy-page/5f22b71054ee7d0012420211>

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

### ***Response Timing and Format***

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### ***Non-Discrimination***

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

### **HOW TO CONTACT US**

If you have any inquiries related to this privacy policy, or the privacy practices of Dispatch, please email us at [privacy@dispatchit.com](mailto:privacy@dispatchit.com), or you can write to us at:

DispatchIt, Inc.  
Attn: Privacy Coordinator  
1401 W. 94<sup>th</sup> St.  
Bloomington, MN 55431

This is also the manner in which you would exercise any rights you may have under the CCPA.

**CHANGES TO THIS PRIVACY POLICY**

Please note that this Policy may be amended from time to time in our sole discretion. You should check back for the most current version before relying on any of the provisions in this Policy. We will provide notice of material changes to this Policy, either by posting a notice on the Platform, by sending an email, or some other reasonable method. Your continued use of the Platform constitutes your acceptance of this Policy and all amendments hereto.

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