

Privacy Policy

Ship District & Ship District Internet Express Privacy Notice

I. Introduction

The Ship District mobile applications and website Ship District Internet Express match carriers with shippers. To enable these applications and websites (the “services”), Ship District and its affiliates (collectively, “Ship District”) collect and use certain information about our users when they use or communicate with us regarding our services. This notice describes the personal data we collect from users of the services, how this data is used and shared, and users’ choices regarding this data.

II. Overview

A. Scope and application

This notice applies to users of Ship District’s services anywhere in the world.

This notice applies to all users of Ship District’s apps, websites, features, or other services anywhere in the world, unless covered by a separate privacy notice. This notice specifically applies to Ship District:

- **Agents/Carriers:** individuals or entities that offer motor vehicles used to transport goods
- **Commercial drivers:** individuals licensed to operate motor vehicles to transport goods for or on behalf of carriers
- **Shippers:** any user of the services that is identified as the shipper, consignor, or consignee, or that owns the goods being transported

All those subject to this notice are referred to as “users” in this notice.

The practices described in this notice are subject to applicable laws in the places in which we operate. This means that we engage in the practices described in this notice in a particular country or region only if permitted under the laws of those places. Please visit and contact us at www.shipdistrict.com, <https://express.shipdistrict.com> or through the addresses below with any questions regarding our practices in a particular country or region.

B. Data controller and transfer

Ship District and Ship District Technologies Inc. are the data controllers for the personal data collected in connection with the use of Ship District’s services in the United States.

Ship District Technologies Inc. is the data controller for the personal data collected in connection with the use of Ship District’s services anywhere else.

Ship District and Ship District Inc. (225 E 12th St, Los Angeles, CA 90015 USA) (collectively, “Ship District”) are the data controllers for the personal data collected in connection with the use of Ship District’s services in the United States.

Ship District Technologies Inc. is the data controller for the personal data collected in connection with the use of Ship District’s services anywhere else. We process personal data inside and outside the United States (“US”). The personal data of users outside the US is transferred on the basis of mechanisms approved under applicable laws, such as the Standard Contractual Clauses.

Questions, comments, and complaints about Ship District's data practices can be submitted to www.shipdistrict.com or www.express.shipdistrict.com

III. Data collections and uses

A. The data we collect

Ship District collects:

- **Data provided by users to Ship District, such as during account creation**
- **Data created during the use of our services, such as location, app usage, and device data**
- **Data from other sources, such as Ship District partners and third parties that use Ship District APIs**

The following data is collected by or on behalf of Ship District:

Data provided by users. This includes:

- **User profile:** We collect data when users create, modify, or log in to their account; when they request support from or otherwise communicate with us; and if they interact with the services as a commercial driver or carrier dispatcher, submit information about their vehicle or insurance, or otherwise communicate with us. This may include their name, email address, phone number, postal address, vehicle registration information, insurance information, payment information, and other information they choose to provide. For users outside the USA, this may also include login name and password, profile picture, and government identification documents, including driver's license numbers and images, birthdate, signature, and photo.
- **Demographic data:** We may collect demographic data about users, including through user surveys. We may also receive demographic data about users from third parties.
- **Data submitted through communications with Ship District:** We collect the information users submit when they contact Ship District customer support, provide facility ratings, or otherwise contact Ship District. This may include feedback, photographs, or other recordings collected by users.

Data created during use of our services. This includes:

- **Location data:** Our services require that we collect precise or approximate location data from commercial drivers' and dispatchers' mobile devices. We only collect such data where users have granted us permission to do so through the permission system used by their mobile or computer device.

For users located outside the USA, Ship District collects this data when the Ship District app is running in the foreground (app open and on-screen) or background (app open but not on-screen) of their mobile or computer device.

For users located in the USA, Ship District collects this data when the Ship District app is running in the foreground (app open and on-screen) of their mobile or computer device. While actively on a load, we also collect this data when the Ship District app is running in the background (app open but not on-screen) of their mobile or computer device, from the time that a user creates an account on the website.

- **Transaction information:** We collect transaction information related to the use of our services, including the type of services requested or provided, date and time the service was provided, distance traveled, payment amounts, and other related transaction details.

- **Photos:** We collect photos of bills of lading, freight, personal identification, and other matters directly related to the services where users have uploaded such photos to the Ship District apps or websites.
- **Usage data:** We collect data about how users interact with our services (including analytics that we or third parties conduct for the purpose of improving our services). This includes data such as access dates and times, app features and/or pages viewed, app crashes and other system activity, type of browser, and third-party sites or services used before interacting with our services. In some cases, we collect this data through cookies, pixels, tags, and similar tracking technologies that create and maintain unique identifiers.
- **Device data:** We may collect data about the devices used to access our services, including the hardware models, device IP address, operating systems and versions, software and file names and versions, preferred language, unique device identifiers, advertising identifiers, serial numbers, device motion data, and mobile network data.
- **Communications data:** We enable users to interact with one another and Ship District through Ship District's mobile apps and websites. To provide this service, Ship District receives some data regarding the calls, texts, or other communications, including the date and time of the communications and the content of the communications. Ship District may also use this data for customer support services (including to resolve disputes between users), for safety and security purposes, to improve our products and services, and for analytics.

Data from other sources. For example:

- We may receive information about commercial drivers from other users such as carriers or shippers, or from other third parties. This includes information about their location or feedback they receive from other Ship District users.
- We might receive information about a commercial driver or carrier from the regulatory bodies involved in the regulation of carriers.
- If users engage with a separate app or website that uses our API (or whose API we use), we may receive information about them or their connections from that site or app.
- We may receive information from publicly available sources and marketing service providers for lead generation. In the USA, we will send users a notification if we collect their information through these resources.
- If users also interact with other Ship District products and services, for instance, to request or provide services through other Ship District apps, we may combine or associate that information with information we have collected from them in their capacity as a user.

Ship District may combine the data collected from these sources with other data in its possession.

B. How we use personal data

Ship District collects and uses data to arrange for reliable and convenient transportation of shipments, delivery, and other products and services. We also use the data we collect:

- **To enhance the safety and security of our users and services**
- **For customer support**
- **For research and development**
- **To send marketing and non-marketing communications to users**

- In connection with legal proceedings

Ship District does not sell or share user personal data with third parties for their direct marketing, except with users' consent.

Ship District uses the data it collects for purposes including:

Providing services and features.

Ship District uses the data we collect to provide, personalize, maintain, and improve our products and services. This includes using the data to:

- Create and update users' accounts
- Enable the matching of shipments with carriers and/or commercial drivers
- Track the status and location of shipments transported through the services, and determine other data relating to use of the services, such as how long a carrier and/or commercial driver has been at a pickup location to determine detention payments
- Send communications to other users of the services, such as shippers, regarding the progress of shipments transported through the services, such as estimated delivery arrival and delivery times
- Personalize and improve the services, including to develop new features and to provide or recommend shipments, features, content, and advertisements
- Offer, process, or facilitate payments for the service
- Perform internal operations necessary to provide our services, including to troubleshoot software bugs and operational problems; to conduct data analysis, testing, and research; and to monitor and analyze usage and activity trends

Safety and security.

We use personal data to help maintain the safety, security, and integrity of our services and users.

This includes:

- Using device, location, profile, usage, and other data to prevent, detect, and combat fraud or unsafe activities
- Authenticating users
- Developing safety features

Customer support.

Ship District uses the information we collect (including recordings of customer support calls with notice to and the consent of the user) to provide customer support, including to:

- Direct questions to the appropriate customer support person
- Investigate and address user concerns
- Monitor and improve our customer support responses and processes

Research and development.

We may use the data we collect for testing, research, analysis, product development, and machine learning to improve the user experience. This helps us to improve and enhance the safety and security of our services, improve our ability to prevent the use of our services for illegal or improper purposes, develop new features and products, and facilitate finance solutions in connection with our services.

Marketing.

Ship District may use the data we collect to market our services to our users. This includes sending users communications about Ship District services, features, promotions, sweepstakes, studies, surveys, news, updates, and events. For further

details about third-party marketing, see below. We may use the data we collect to personalize the marketing communications (including advertisements) that we send, including based on user location, past use of Ship District's services, and user preferences and settings.

Non-marketing communications.

Ship District may use the data we collect to generate and provide users with receipts; inform them of changes to our terms, services, or policies; or send other communications that aren't for the purpose of marketing the services or products of Ship District or its partners.

Legal proceedings and requirements.

We may use the personal data we collect to investigate or address claims or disputes relating to use of Ship District's services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.

C. Cookies and third-party technologies

Ship District and its partners use cookies and other identification technologies on our apps, websites, emails, and online ads for purposes described in this notice.

Cookies are small text files that are stored on browsers or devices by websites, apps, online media, and advertisements. Ship District uses cookies and similar technologies for purposes such as:

- Authenticating users
- Remembering user preferences and settings
- Determining the popularity of content
- Delivering and measuring the effectiveness of advertising campaigns
- Analyzing site traffic and trends, and generally understanding the online behaviors and interests of people who interact with our services

We may also allow others to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet, and to track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs, and other technologies to identify the devices used by visitors to our websites, as well as when they visit other online sites and services.

D. Data sharing and disclosure

Some of Ship District's products, services, and features require that we share data with other users or at a user's request. We may also share data with our affiliates, subsidiaries, and partners, for legal reasons or in connection with claims or disputes.

Ship District may share the data we collect:

With other users or third parties

This includes sharing data:

With other users or with third parties who require, request, or use such data in connection with transportation, logistics, delivery, and/or other related services arranged or performed by Ship District, such as rewards partners for fuel discounts and similar discount programs. We may also share commercial drivers' names, vehicle license numbers, vehicle truck numbers, and approximate location with other users or third parties such as operators of a receiving facility. We may also share their vehicle truck number and vehicle license number with third parties, such as a pickup facility. We may also share carriers' names with other users.

At users' request

This includes sharing data:

- With other users in connection with services or features that require data sharing.
- With third parties in connection with Ship District partnerships or promotions with those third parties. For example, if a user requests a service through a partnership or promotional offering made by a third party, Ship District may share certain data with those third parties. This may include, for example, other services, platforms, apps, or websites that integrate with our APIs; those with an API or service with which we integrate; or other Ship District business partners and their users in connection with promotions, contests, or specialized services. The handling of such data by those third parties is subject to their privacy notices, and users should refer to those notices for more information on the handling of their data.

With the general public

Questions or comments from users submitted through public forums, such as blogs and social media pages, may be viewable by the public, including any personal data included in the questions or comments submitted by a user, or other features of the services that are viewable by the general public.

With Ship District affiliates and third parties

We share data with Ship District affiliates to help us provide our services or conduct data processing on our behalf, or for data centralization and/or logistics purposes. We also share data with third parties with whom users choose to let us share data, for example other apps or websites that integrate with our API or services, or those with an API or service with which we integrate.

With Ship District service providers and business partners

Ship District provides data to vendors, consultants, marketing partners, research firms, and other service providers or business partners. These include:

- Payment processors and facilitators
- Cloud storage providers
- Marketing partners and marketing platform providers, including social media advertising services
- Data analytics providers
- Research partners, including those performing surveys or research projects in partnership with Ship District or on Ship District's behalf
- Vendors that assist Ship District to enhance the safety and security of its apps
- Consultants, lawyers, accountants, and other professional service providers

For legal reasons in the event of a dispute

Ship District may share users' personal data if we believe it's required by applicable law, regulation, operating license or agreement, legal process or governmental request, or where the disclosure is otherwise appropriate due to safety or similar concerns.

This includes sharing personal data with law enforcement officials, public health officials, other government authorities, or other third parties as necessary to enforce our "Terms and Conditions", user agreements, or other policies; to protect Ship District's rights or property or the rights, safety, or property of others; or in the event of a claim or dispute relating to the use of our services. In addition, where a user uses another person's credit card, we may be required by law to share that user's personal data with the owner of that credit card.

This also includes sharing personal data with others in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company.

Through social media sharing

The services may integrate with social media sharing features and other related tools, such as WhatsApp, which let users share actions they take on the services with other apps, sites, or media, and vice versa. Their use of such features enables the sharing of data with others, depending on the settings they establish with the social media sharing service. Please refer to the privacy notices of those social media sharing services for more information about how they handle the data provided to or shared through them.

With consent

Ship District may share a user's personal data other than as described in this notice, if we notify the user and they consent to the sharing.

E. Data retention and deletion

Ship District retains user profile, transaction, and other personal data for as long as a user maintains their Ship District account.

Ship District retains transaction, location, usage, and other information for as long as necessary, such as in connection with regulatory, tax, insurance, or other requirements in the places where it operates.

Users may request the deletion of their accounts at any time. Following such a request, Ship District deletes the data it is not required or has no legitimate business purpose, to retain and restricts access to or use of remaining information it does retain.

Ship District retains user profile and transaction information for as long as a user maintains their Ship District account. For carriers and/or commercial drivers, Ship District also retains information relating to their vehicle and licenses (to the extent permitted by law) for as long as they maintain their Ship District account.

Ship District retains location, device, and usage data for as long as necessary to provide services and comply with applicable regulatory, tax, insurance, litigation, and other legal requirements. Ship District may also use such information for purposes of safety, security, fraud prevention and detection, and research and development for as long as it retains such information.

Users outside the USA may request the deletion of their account by emailing support@shipdistrict.com. Users in the USA may request the deletion of their account at any time by emailing support@shipdistrict.com. Following such requests, Ship District deletes the data that it is not required to retain for purposes of regulatory, tax, insurance, litigation, or other legal requirements. In certain circumstances, Ship District may be unable to delete a user's account, such as if there's an outstanding credit on the account or an unresolved claim or dispute. Upon resolution of the issue preventing deletion, Ship District will delete the account as described above.

Ship District may also retain certain information if necessary, for purposes of safety, security, and fraud prevention. For example, if we deactivate a user's account because of unsafe behavior or security incidents, we may retain certain information about that account to prevent that user from opening a new Ship District account in the future.

F. Grounds for processing

We only collect and use personal data where we have lawful grounds to do so. These include processing user personal data to provide requested services and features, for purposes of Ship District’s legitimate interests or those of other parties, to fulfill our legal obligations, or based on consent.

We collect and use personal data only where we have one or more lawful grounds for doing so. Such grounds may vary depending on where our users are located, but generally include processing personal data:

To provide requested services and features

In order to provide our services, we must collect and use certain personal data. This includes:

- User profile data, which we use to establish and maintain user accounts; verify user identity; communicate with users about their booked loads, trips, and accounts; and enable users to make payments or receive earnings
- Location data, which is used to track loads and assist with navigation
- Usage data, which is necessary to maintain, optimize, and enhance Ship District’s services, including to determine incentives, connect loads and commercial drivers, and calculate payments
- Transaction information
- Information relating to customer support

For purposes of the legitimate interests of Ship District or other parties

This includes using personal data to maintain and enhance our users’ safety and security. For example, we use personal data to prevent use of our services by users who have engaged in inappropriate or dangerous behavior, such as by retaining data of banned users to prevent their use of Ship District’s apps.

This also includes purposes such as combating fraud; improving our services, direct marketing, machine learning, and research and development; and enforcing Ship District’s “Terms and Conditions”.

In addition, it includes using personal data to the extent necessary for the interests of other people or the general public, such as in connection with legal or insurance claims, and to protect the rights and safety of others.

To fulfill Ship District’s legal obligations Ship District is subject to the laws and regulations in the jurisdictions in which it operates that may require it to collect, process, retain, and disclose users’ personal data. We collect and use personal data to comply with such laws.

Ship District may also share data with law enforcement regarding criminal acts or threats to public safety, or requests by third parties pursuant to legal processes.

With consent, Ship District may collect and use personal data based on the user’s consent. For example, we may collect personal data through voluntary surveys.

Users may revoke such consent at any time. However, they will not be able to use any service or feature that requires collection or use of that personal data.

IV. Choice and transparency

Ship District enables users to access and control the data that it collects, including through:

- **In-app settings**
- **Device permissions**
- **Marketing opt-outs**

Ship District also enables users to request access to or copies of their data, changes or updates to their accounts, deletion of their accounts, or that Ship District restricts its processing of user personal data.

Device permissions

Most mobile device platforms (iOS, Android, etc.) have defined certain types of device data that apps cannot access without the device owner's permission, and these platforms have different methods for how that permission can be obtained. iOS devices notify users the first time the Ship District app requests permission to access certain types of data and give users the option to grant or refuse permission. Android devices notify users of the permissions that the Ship District app seeks before their first use of the app, and the use of the app constitutes a grant of such permission.

- Location data

We request permission for our app's collection of precise location from a user's device (whether their own device or otherwise) per the permission system used by their mobile operating system. If they initially permit the collection of this data, they can later disable it by changing the location settings on their mobile device. However, they may not be able to use the Ship District app if they disable our collection of precise location data. Additionally, disabling our collection of precise locations from their device will not limit our ability to derive an approximate location from their IP address to personalize the content of the websites and/or app.

- Important information about device permissions

The permissions requested by the Ship District app include permission to collect users' location data for the purposes described above. For users outside the USA, this permission enables Ship District to collect this data when the Ship District app is running in the foreground (app open and on-screen) or background (app open but not on-screen) of their mobile device.

For users in the USA, this permission enables Ship District to collect this data when the Ship District app is running in the foreground (app open and on-screen) of their mobile device. If a user is actively on a load, we also collect this data when the Ship District app is running in the background (app open but not on-screen) of their mobile device, from dispatch until dropoff of a load.

Carriers and commercial drivers cannot use the Ship District app if they do not permit location data collection.

Please take the following steps to disable the Ship District app's ability to collect precise location data:

On iOS

Settings → Privacy → Location Services → Ship District → choose **Never**

On Android

Settings → Apps → Ship District → scroll to Permission → toggle Location

On Android Lollipop (5.1) and earlier Settings → Location → toggle **Off**

- Notifications: account and updates Ship District provides users with notifications and updates related to activity on their account and booked loads. These notifications are a necessary part of using the Ship District app and cannot be disabled.

- Notifications: potential loads and news Users may enable Ship District to send push notifications about potential loads and news from Ship District. Push notifications may be enabled or disabled through Settings on iOS or Android.

Marketing opt-outs

Users may opt out of receiving marketing emails and other messages from Ship District by following the unsubscribe instructions in those messages. We may still send opted-out users non-promotional communications, such as those about their account, services requested, or our ongoing business relations.

User data requests

Ship District provides users with a variety of ways to learn about, control, and submit requests, questions, and comments about Ship District's handling of their data. Users may submit these by email to support@shipdistrict.com if outside the USA, and to support@shipdistrict.com if in the USA.

- **Accessing data:** Users can ask for an explanation of the data we collect from them and how we use it.

- **Receiving data:** Users can ask for a copy of data that Ship District has collected from them with their consent or as necessary to provide our services.

- **Changing or updating data:** Users can ask that Ship District change or update their data, including if they believe such data is inaccurate or incomplete.

- **Deleting data:** Users may request deletion of their account at any time by emailing support@shipdistrict.com if outside the USA, or support@shipdistrict.com if in the USA.

- **Objections, restrictions, and complaints:** Users may request that we stop using all or some of their personal data, or that we limit our use of their data. Ship District may continue to process data after such objection or request to the extent required or permitted by law.

V. Updates to this notice

We may occasionally update this notice. Use of our services after an update constitutes consent to the updated notice to the extent permitted by law.

We may occasionally update this notice. If we make significant changes, we will notify users in advance of the changes through the Ship District apps or through other means, such as email. We encourage users to periodically review this notice for the latest information on our privacy practices.

After such notice, the use of our services by users in countries outside the USA will be understood as consent to the updates to the extent permitted by law.

Privacy Policy (Continued)

Agents

To participate as a Ship District Agent app agent, you must permit Ship District Agent Services to access location services through the permission system used by your mobile operating system ("Platform") or browser. We may collect the precise location of your device when the Ship District Agent app is running in the foreground or background of your device. We may also derive your approximate location from your IP address. We use your location information to verify that you are present in your preferred region or city when you begin or engage in delivery through the Ship District Services (a "Delivery"), connect you with delivery opportunities in your zone, and track the progress and completion of your Deliveries. You can enable the location tracking

feature through the settings on your device or Platform or when prompted by the Ship District Agent mobile app. If you choose to disable the location feature through the settings on your device or Platform, Ship District will not receive precise location information from your device, which will prevent you from being able to Trip and receiving delivery opportunities in your area.