

SEKO Logistics **Client Privacy Policy**

Your privacy and the safekeeping of the information provided to us, is important. SEKO Logistics and its affiliates and subsidiaries (“SEKO”) conducts its business ethically and in compliance with all laws in countries where SEKO does business. SEKO is firmly committed to being transparent about how it collects and uses any of your personal data. This Client Privacy Policy is subject to all applicable international laws where SEKO does business, including but not limited to those in the U.S., federal and state requirements and the EU General Data Protection Regulation 2016/679 (collectively, the “Laws”).

Our Client Privacy Policy: This Client Privacy Policy: 1) applies to all public and non-public, online and offline, collected, stored, processed, transferred and disclosed personal data of SEKO’s clients, service providers, agents, contractors and others who share their personal data with SEKO; and 2) describes what types of personal data we collect, how we use the information, whom we share it with, and the choices you can make about SEKO's use of your information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices. Our privacy practices may vary among the countries in which we operate to reflect local practices and legal requirements. We reserve the right to change this Privacy Policy at any time, and will indicate the date the Privacy Policy was most recently updated.

Cyber Security Protection: SEKO abides by internal strict guidelines and procedures pertaining to Cyber Security. Security Measures such as URL PROTECTION, ATTACHMENT PROTECTION, INTRUSION PREVENTION PROGRAM, SECURE MESSAGING OPTIONS FOR SENSITIVE EMAIL and UNIFIED SECURITY MANAGEMENT help aid in our efforts to secure your data. If you have further questions on our Cyber Security procedures, please reach out to the Data Controller.

What Information We Collect From You: You may provide Personal Data such as your name, address, email, phone, IP address, or geographic location and other personally identifiable and non-public information. Some personal data we collect only when you provide it to us. This *may* include but is not limited to:

- Individual and business contact information (such as name, job title, department, company name, postal or e-mail address, and telephone or fax number)
- Shipment information (such as contact information of shipper, consignee and/or notify party, signature on delivery order, description of goods, number of pieces, weight and value of shipment) that is provided to authorities for customs and tax clearance or for security screening
- Financial information (such as financial account information used for credit set-up and/or information that may be contained in a business credit report such as by Dun & Bradstreet)
- CCTV image, photo, and biometric data such as hand-scans, or even your signature
- Some personal data we collect automatically when you use our website, applications software (App), or services. This is known as user-generated content and may include some or all of the following types of information:
 - Your Internet Protocol (IP) address

- Cookie identifier (see SEKO's Cookie Statement which can be found on our website at www.sekologistics.com)
- Country of origin information (from which country you are accessing our website)
- Mobile device unique identifier (when accessing web browsers)
- SMS Text
- Social Media identifier when using SEKO's social media platforms (such as Facebook or Twitter ID)
- Geographic location based on GPS/Wi-Fi/communications network local information

Why We Collect Your Data: If you are a client, service provider, agent or contractor, we collect and use your Personal Data to provide the products and services you request; to improve our products and services; send notifications; and protect against, identify and prevent fraud and other criminal activities, claims and other liabilities among others.

If you are a client, service provider, agent or contractor, we may collect, process, and/or otherwise use your Personal Data for the following purposes (including but not limited to):

- Provide the information, products and services you request
- Create, view and track shipments
- Provide you with shipment information such as tracking and tracing of shipment location
- Bill you for the products and services you request
- Provide you, if you are a client, with effective customer service
- Contact you with information and notices related to your use of our products and services, including our website
- Contact you with special offers and other information we believe will be of interest to you (in accordance with any privacy preferences you have expressed to us)
- Vet you, if you are a service provider, agent or contractor, to ensure that you (and your company) have the appropriate experience and qualifications to provide services on our behalf
- Invite you to participate in surveys and provide feedback to us (in accordance with any privacy preferences you have expressed to us)
- Improve our products and services and develop new products and services
- Improve our marketing and promotional efforts
- Improve the content, functionality and usability of our website
- Enforce our website's Terms of Use including your privacy rights contained therein, which can be found at www.sekologistics.com
- Use for any other purpose about which we provide notice at the time of collection
- Comply with legal and regulatory requirements; monitoring and enforcing compliance with company policies and procedures and with legal and regulatory requirements
- Protect the security of Personal Data as well as SEKO systems and premises
- Protect against, identify and prevent fraud and other criminal activity, claims and other liabilities

How We Collect Your Data: SEKO collects information about you from various sources. For example, we may have a direct relationship with you, and you may choose to provide information to us in connection with that relationship. You may choose to submit information to us, for

example, in person, over the phone, through the postal mail service or electronic mail, on our website, in connection with use of our products, services or applications software, when you participate in an offer or promotion, or in connection with an actual or potential business or employment relationship with us. We also may obtain information about you from you directly or from companies that use our products or services, publicly available information systems, business credit reporting agencies, and commercial information services. We also collect data automatically, by your Web browser when you visit our website. This information typically includes your IP address, the identity of your Internet service provider, the name and version of your operating system, the name and version of your browser, the date and time of your visit, the pages you visit, your location and your mobile device unique identifier.

Data Transfers: We do not sell, disclose, or otherwise process your Personal Data except as described herein or otherwise disclosed to you at the time the data is collected. We will retain your Personal Data no longer than is necessary to carry out the purposes listed in this Privacy Policy and/or as required by applicable law.

SEKO may at times share information with third parties in situations where we believe, in good faith, that the law requires us to do so. Such instances that third parties would be involved would be exclusively to the required extent in order to perform the services that you have requested or authorized and to protect your and our rights, property or security, if we are obligated to do so based on applicable laws, orders by courts or other government regulations. SEKO understands that our agents, clients and other affiliate companies to whom we pass on your Personal Data, might possibly be domiciled outside of your home country, and potentially also in countries with data protection laws that can differ from those applicable in the country where you are domiciled. In such cases, SEKO will ensure and take measurable steps to protect your Personal Data by introducing suitable legal mechanism, e.g. SEKO Logistics Data Processing Agreement which contains contractual protections for the transfer of personal information among various jurisdictions (including, e.g., the European Commission's Standard Contractual Clauses).

You can be assured that we protect the information we collect. By using our products and or services and by accessing our website, you agree to the collection, use and sharing of your Personal Data and information in accordance with this Privacy Policy.

What Rights Do You Have Over Your Information?: You can request a confirmation from the Data Controller of whether Personal Data is being processed by us. You may ask us how we process your data, correct or delete your Personal Data, request to limit the processing of Personal Data, to request a receipt of personal information relating to you that you have made available to the Data Controller and you have the right to revoke your consent at which time the legitimacy of the processing that has taken place up until your objection will not be affected by the revocation of the consent. Where the applicable Laws require it, you may also have the right to request and obtain a complete copy of all information stored about you.

How Safe Is My Information?: SEKO has in place industry-accepted physical, technical and administrative security measures appropriate and applicable to our business to safeguard and secure the Personal Data we collect from you.

You have the right to expect us to protect your Personal Data and keep it safe. We work hard to protect SEKO, our clients, partners, customers, shippers, vendors and users from unauthorized



access to or unauthorized alteration, disclosure or destruction of the information we hold. In particular:

we stand by this Privacy Policy at all times with respect to all Personal Data that we collect from you by limiting the use and disclosure of your Personal Data, and work to ensure that anyone with whom we share such information treats that information with the privacy and security it deserves.

How Can I Contact You?:

The Data Controller in the definition of the EU General Data Protection Regulation and other, national data protection laws of the Member States as well as further data protection regulations is:

Data Controller:

Chief Technology Officer

1100 Arlington Heights Road, Suite 600

Itasca, IL 60143

USA

#630-919-4800

dataprivacy@sekologistics.com

Data Protection Officer:

General Counsel, Vice President

SEKO Logistics

1100 Arlington Heights Road, Suite 600

Itasca, IL 60143

USA

#630-919-4800

dataprivacy@sekologistics.com

Last Updated: May 24, 2018