

# Privacy Policy

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## 1. Introduction

Carrier Index ("Company," "we," "us," or "our") respects your privacy and is committed to protecting it through this Privacy Policy. This document explains how we collect, use, disclose, and safeguard your information when you visit our platform and use our services. By using Carrier Index, you consent to the practices described in this Privacy Policy.

## 2. Information We Collect

We collect various categories of personal and business data, including but not limited to:

### A. Data for User and Business Verification

- Documents submitted by brokers and carriers to verify identity and licenses required for conducting business on Carrier Index. This includes, but is not limited to, proof of identity documents (e.g., driver's license, passport), and business registration documents.
- Licensing and other documentation necessary to validate a company's ability to engage in freight transportation and brokerage (e.g., MC Authority, insurance certificates).

### B. Data for Transport and Settlement Process Management

- Client, broker, and carrier details, including contact information (name, address, phone number, email) and company-specific data (company name, MC number, DOT number).
- Load details, including origin, destination, dates, times, commodity, weight, special requirements, insurance, and factoring information.
- Banking details for financial transactions (account number, routing number).
- Vehicle-specific details, including registration, ownership documents, VIN, make, model, and trailer information.
- Documents verifying the above data, such as licenses, certificates, and agreements.
- Load-related documents such as bills of lading (BOLs), shipping manifests, and proof of delivery (POD).
- Message history conducted via our built-in chat service.
- Rate confirmation agreements and related communications.

### C. Employee and Driver Data for Workforce Management and Compliance

- Personal information of employees and drivers, including full name, phone number, email, job title, and Commercial Driver's License (CDL) details.
- Motor Vehicle Record (MVR) information (subject to consent and legal limitations).
- Potential collection of biometric data for verification and authentication in the future (subject to explicit consent and compliance with applicable laws).

### D. Technical and Location Data for Security and Optimization

- User location data for load tracking, only active when a load is assigned and with user consent where required by law. We may collect location data in the background if you grant

us permission.

- Mobile device data, including system-level permissions, device sensors (such as accelerometer, gyroscope, magnetometer, and others), and environmental readings (e.g., temperature, light, pressure).
- Connection data such as IP addresses, browser type, operating system, referring URLs, and server logs.
- Device identifiers (e.g., UDID, IMEI, MAC address).

#### **E. Analytical Data for Service Improvement and Security**

- Necessary cookies for the proper operation of the service (e.g., session cookies).
- Third-party cookies (e.g., Google Maps, analytics providers) essential for functionality and service improvement.
- Data storage for identifying behavioral patterns to detect potential fraud and misuse of the platform.
- Planned use of proprietary tools for biometric authentication (e.g., facial recognition) (subject to explicit consent and compliance with applicable laws).
- Information related to your use of the Services, including (among other things) content viewed by users and a user's path through our Services.
- There is also information about your phone and/or computer hardware and software that is automatically collected by Carrier Index when you are using Carrier Index mobile applications or web sites. This information can include information such as: your phone platform, browser type, type of operating system, type of Java virtual machine, Internet connection speed, access times and identification of any software program or hardware which has previously caused technical problems with the Carrier Index product(s). In addition, when you connect to any of our websites directly or through Carrier Index applications, we will detect your IP address and store a cookie on your phone or computer.

#### **F. Information You Provide Directly**

- Information provided when you request technical support or information for Carrier Index Services, we ask you for your personal information and other information necessary to answer your question or resolve your problem.
- When you enter a contest or promotion sponsored by Carrier Index and/or our partners, we ask for your contact information so that our partners or we can administer the contest or promotion, and notify winners.
- We occasionally ask Carrier Index Users or visitors to fill out optional surveys and/or questionnaires. These surveys/questionnaires may ask for demographic information, shopping or dining habits, information about computer use and other information pertinent to provision of the Services.
- When you use the Carrier Index Services, we may collect any information that you enter or give us in any other way in order to contact you about Carrier Index Services. Additionally, if you want to learn more about our products or services, we may request that you fill out a form in which we ask for information such as your first/last name, mailing address, email address, as well as your phone number.

### **3. How We Use Your Data**

We process your data for the following purposes:

- Verifying user and company credentials and ensuring compliance with regulations.
- Facilitating and managing transport operations, load matching, and settlements.
- Enhancing security and fraud prevention, including detecting and preventing unauthorized access and activity.
- Improving user experience and operational efficiency through AI-powered analysis and personalization.
- Providing customer support and responding to inquiries.
- Complying with legal and regulatory obligations, including responding to legal requests and investigations.
- Statistically analyze site usage, including the behavior of our users, to improve the content, layout, and services of the Carrier Index websites, as well as to enhance our marketing and promotional efforts.
- Process payments, confirm renewal charges or payments to your account, administer your account, and the like.
- Notify you about important functionality changes to the website, new Carrier Index Services, and special offers (including promotion of our product or third party products) we think you'll find valuable.

### **4. Data Sharing and Disclosure**

We may share your data with:

- Third-party service providers supporting our operations (e.g., payment processors, insurance providers, background check services, cloud hosting providers, analytics providers, communication platforms). We use reasonable efforts to ensure these providers protect your data.
- Government authorities as required by law, regulation, or legal process.
- Trusted partners necessary for transport and logistics operations (e.g., brokers sharing carrier information for load assignment, shippers receiving location updates).
- Agents: We may employ other companies and individuals who are subject to confidentiality obligations, to perform functions on our behalf. Examples include, but are not limited to, sending postal mail and email, removing repetitive information from customer lists, analyzing data, providing marketing assistance, providing customer service, and collecting and processing payments for the Carrier Index subscription Services. They have access to personal information needed to perform their functions, but may not use it for other purposes.
- Promotions, Sweepstakes/Contests: Some Carrier Index promotions, sweepstakes/contests may require that you provide additional information, such as your mailing address or credit card number. Such information may be shared with a third party if such third party is sponsoring the event or if the information is necessary in order to administer the service or process your transaction.
- Legally Compelled Disclosure and Other: Carrier Index may disclose or access account information when we believe in good faith that the law requires it or for the protection of our legal rights. Carrier Index may also disclose information in special cases when we have

reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating the Terms. We can disclose any personal information about you to law enforcement or other government officials as we, in our sole discretion, believe necessary or appropriate, in connection with a violation of the Terms, an investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose us to legal liability.

## **5. Data Security**

We implement industry-standard security measures to protect collected data against unauthorized access, alteration, disclosure, or loss. These measures include:

- Firewalls and intrusion detection systems.
- Employee training on data security best practices.
- Reasonable administrative, physical, and technical safeguards designed to protect the confidentiality of your personal information. However, no data transmission over the Internet can be guaranteed to be 100% secure.
- Your Carrier Index account is password-protected so in addition to those partners or agents who may provide you services, only you and those you designate can access it and view the user information relevant to your account. Ultimately, you are responsible for maintaining the secrecy of your passwords and any account information. Remember to log out of your Carrier Index account and close your browser window when you are done. This ensures that others cannot access your personal information if your computer is accessible to others.

However, no system is entirely secure, and we encourage users to take precautions when sharing sensitive information, such as using strong passwords and being aware of phishing attempts.

## **6. User Rights and Choices**

You have the right to:

- Access and update your personal data.
- Rectify inaccurate or incomplete personal data.
- Request the deletion of certain information, subject to legal and contractual limitations.
- Object to the processing of your personal data for certain purposes, such as marketing.
- Restrict the processing of your personal data under certain circumstances.
- Data portability: Request a copy of the personal data we hold about you in a structured, machine-readable format.
- Withdraw consent: If we are processing your data based on consent, you have the right to withdraw your consent at any time.
- Opt-out of receiving messages from Carrier Index: You can indicate your preference by clicking the respective box of your choice. You can opt-out of receiving such information by logging into your account and visiting the “Update Profile” section within the “Manage Account” page, if available, or you can click on the “Opt-Out” link in email sent to you and completing the Opt-Out form.
- Not opt-out of receiving messages relating to material company announcements or policy changes, or administrative matters relating to your account, like billing, collections, customer support or the like.

- Unsubscribe to click on the “unsubscribe” link at the bottom of any email you receive and Carrier Index will remove you from the list of those who will be contacted with more information about the Carrier Index service.

To exercise these rights, please contact us using the contact information provided below. We will respond to your request within a reasonable timeframe.

## **7. Cookies and Similar Technologies**

We use cookies and similar technologies (e.g., web beacons, pixels) to collect information about your browsing activity on our platform.

- Cookies are small pieces of information stored on your phone or hard drive, not on our site. The use of cookies is an industry standard, generally used by most major Web sites to improve their services. Carrier Index uses cookies because they allow us to store your password without your having to constantly re-enter it. Cookies can also help us track your behavior on our site so that we can tailor our marketing message to better match your needs and interests. Finally, by tracking behavior on our site, cookies allow us to better understand how users use our Services, which in turn helps us focus our resources on features that are most popular with our users. You are always free to decline our cookies if your browser permits, but some parts of our Services may not work properly if you do so.
- Carrier Index may place advertising on our Services that originates from outside advertisers and/or advertising agencies, and may use the services of third party companies to display such advertising. For more information regarding the advertiser and/or advertising agencies and their privacy policies, return to that advertiser’s home page and click on their Privacy Policy link. In some cases, if you click on or view these ads, the advertiser may assign you a cookie. Carrier Index does not control these cookies. You can control cookies through your browser settings. Please note that disabling cookies may affect the functionality of our platform.

## **8. Data Retention**

We retain your personal data for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law. The criteria used to determine our retention periods include:

- The length of our relationship with you.
- Whether there is a legal obligation to retain the data.
- Whether retention is advisable in light of our legal position (such as regarding applicable statutes of limitations, litigation or regulatory investigations).

## **9. How Can I Request Carrier Index Delete My Personal Information?**

Depending on your state of residence, you may have certain rights with respect to personal information, including the right to request that we delete any personal information about you that you have provided to us and that we have retained, subject to certain exceptions.

Regardless of your state of residence, you may request that we delete your personal information, including your account and related information, by making a verifiable consumer request by contacting us using the contact information below, subject to Section 14

Upon receiving your request, we may request specific information from you to help us confirm your identity and verify the type of request you are making. Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification. To verify a request, you will need to provide:

- Your name
- Proof of your identity and address, which may include your email and/or phone number
- A description of what right you want to exercise and the information to which your request relates
- If your request is submitted on your behalf by an authorized representative, you will need to provide proof of the representative's authority to act on your behalf by writing signed by you.

If we are unable to verify your request, we may deny the request or ask you for additional information that is reasonably necessary to authenticate your identity in connection with your request. In addition to our right to deny your request we may deny your request if retaining your personal information is necessary for us or our service providers to:

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible;
- Debug products to identify and repair errors that impair existing intended functionality;
- Comply with a legal obligation, applicable law and/or law enforcement requests;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

In addition, we may refuse a request if we have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices.

## **10. Children's Privacy**

Carrier Index is not intended for use by children under the age of 13. We do not knowingly collect personal information from children. Please do not use Carrier Index if you are under the age of 13.

## **11. ELD Privacy Policy**

Integrating your GPS/ELD/telematics devices with Carrier Index is used for the purpose of providing visibility on active Carrier Index broker customers' loads within the Carrier Index Load Tracking platform and improving our products and services, including using the foregoing as input for training artificial intelligence, machine learning, or similar technologies. Carrier Index pulls data when a truck is assigned to an active load and the data we read and display may include the following:

- Vehicle identifier/asset ID (tractor number, trailer number, personID or device ID)
- Latitude/longitude coordinates
- Corresponding timestamp
- Temperatures, such as ambient temperature, humidity level, and/or set and recorded temperatures
- Refrigerated trailer details (power status, alarms, etc.)

- Carrier Index calls the provider's API with the API key/credentials the carrier shared to pull the location data for
- the assigned truck at a frequency of every 5-20 minutes. We display the last known location of the assigned truck on
- the broker's load within their Load Tracking account. This data may also be sent to the broker's TMS if they have a
- TMS integration with Carrier Index for Load Tracking.

## 12. California Privacy Rights

This section provides specific information for California residents, as required by the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA).

### A. Categories of Personal Information We Collect

In the preceding sections of this Privacy Policy, we have described the categories of personal information we collect. To summarize, we collect the following categories of personal information:

- Identifiers (e.g., name, address, email address, phone number, IP address, device identifiers, account name, driver's license).
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) (e.g., contact information, financial information, employment information).
- Protected classification characteristics under California or federal law (e.g., gender, age).
- Commercial information (e.g., transaction history, products or services purchased, obtained, or considered).
- Biometric Information (subject to consent).
- Internet or other electronic network activity information (e.g., browsing history, search history, interactions with our website and mobile applications).
- Geolocation data (only when tracking loads with consent).
- Sensory data (e.g., audio recordings of customer service calls with consent).
- Professional or employment-related information (e.g., job title, employer, work history, CDL).
- Education information.
- Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

### B. Sources of Personal Information

We collect the categories of personal information described above from the following sources:

- Directly from you (e.g., when you create an account, submit documents, communicate with us).
- From your devices (e.g., through cookies and other tracking technologies).
- From third-party service providers (e.g., payment processors, background check services).
- From our business partners (e.g., brokers, shippers).
- From publicly available sources.

### C. Purposes for Collecting Personal Information

We use the categories of personal information described above for the purposes described in Section 3 of this Privacy Policy, "How We Use Your Data."

#### D. Disclosure of Personal Information

We may disclose the categories of personal information described above to the categories of third parties described in Section 4 of this Privacy Policy, "Data Sharing and Disclosure."

#### E. Your California Privacy Rights

As a California resident, you have the following rights regarding your personal information:

1. Right to Know: You have the right to request that we disclose to you:
  - 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 or selling personal information.
  - The categories of third parties with whom we share personal information.
  - The specific pieces of personal information we have collected about you.
2. Right to Delete: You have the right to request that we delete personal information we have collected from you, subject to certain exceptions (e.g., legal obligations, fraud prevention, compliance with regulations).
3. Right to Correct: You have the right to request that we correct inaccurate personal information that we maintain about you.
4. Right to Opt-Out of Sale or Sharing: We do not sell your personal information. While we share some information with Google Maps, which is essential for our website's core functionality, this sharing is done as part of a service provider relationship necessary to provide our services and not for cross-context behavioral advertising purposes. As this sharing is essential for our website's operation and covered under service provider provisions of CCPA/CPRA, it is not subject to opt-out rights.
5. Right to Limit Use and Disclosure of Sensitive Personal Information: You have the right to direct us to only use your sensitive personal information for the purposes of providing you with the services you requested. To exercise this right, please contact us at [contact@carrierindex.com](mailto:contact@carrierindex.com).
6. Right to Non-Discrimination: We will not discriminate against you for exercising any of your CCPA/CPRA rights. This means we will not deny you services, charge you different prices or rates, or provide you with a different level of quality of services.

Any data collected through Google Maps is managed directly by Google and subject to Google's Privacy Policy. For any requests regarding data collected by Google Maps, including access, deletion, or correction requests, you should contact Google directly through their privacy tools and settings. We do not have direct control over or access to the data collected by Google Maps.

#### F. How to Exercise Your Rights

To exercise any of your California privacy rights, please contact us at: [contact@carrierindex.com](mailto:contact@carrierindex.com)

Only you, or a person that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. If you use an authorized agent, you must provide the agent with written permission to do so and verify your own identity directly with us. We may deny a request from an agent that does not submit proof that they have been authorized by you to act on their behalf.



## G. Verification

To protect your privacy and the security of your personal information, we will verify your identity before responding to your request. We may require you to provide information that matches the personal information we have on file for you.

## H. Shine the Light Law (Cal. Civ. Code § 1798.83)

California's "Shine the Light" law permits users of our Services that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us at [contact@carrierindex.com](mailto:contact@carrierindex.com).

## **13. Changes to This Privacy Policy**

This Privacy Policy is periodically reviewed by Carrier Index and may be subject to change. Therefore, please check this Privacy Policy periodically and you may refer to the date posted at the top of this page to determine when this policy was last updated. Use of the Services constitutes consent to any policies then in effect.

If we are going to use your personal information in a manner different from as the uses indicated in our Privacy Policy at the time of collection, we will notify you via email. You will have a choice as to whether or not we use your information in this different manner. In addition, if we make any material changes in our privacy practices that do not affect user information already stored in our database, we will post a prominent notice on our Services notifying users of the change. In some cases where we post the notice, we will also email users who have opted to receive communications from us, notifying them of the changes in our privacy practices.

We may update this Privacy Policy periodically. Any changes will be posted on this page with an updated effective date. We will also provide notice of significant changes as required by law. Your continued use of the platform after the effective date of any changes constitutes your acceptance of the revised Privacy Policy.

## **14. Contact Information**

For any questions or concerns regarding this Privacy Policy, please contact us at: [contact@carrierindex.com](mailto:contact@carrierindex.com)