

Floteq USA, LLC

Privacy Policy

Updated, posted and effective on April 3, 2023

Floteq USA, LLC ("FLOTEQ USA", "us", "our" or "we") provide this privacy policy (this "Policy") to inform you of: (1) the types of information we collect; (2) your choices surrounding such information; and (3) how we collect, use, share, update and secure such information. This Policy applies to information obtained in connection with FLOTEQ USA operations at or through our websites, our mobile/tablet sites, our social media presence, our applications (apps), our registration and event services, our messaging platforms, and other FLOTEQ USA owned or controlled digital and omni-channel properties that link to this Policy (individually a "Site" and collectively, our "Sites"). Emails, social media, marketing campaigns and digital and online advertising are referred to collectively as, our "Internet Marketing Channels."

I. Categories of Information Collected

Some of the information we collect is "Personal Information," which generally means information that identifies you as an individual, and other information we associate with it. This may include a name, mailing address, e-mail address, credit/debit card information (and related payment information) and/or telephone number. If you provide us with personal information about any other individual, you represent that you have that person's consent to give us their information and to be used in accordance with this policy.

We collect several categories of information, from the different sources:

A. Information You Provide: We receive information you provide to us when you:

- (1) create an account with us (an account to use Floteq USA Dashboard or any other type of account);
- (2) make a purchase or return;
- (3) apply for employment opportunities;
- (4) contact us via any customer service method;
- (5) submit user-generated content (via our Sites, Internet Marketing Channels or otherwise);
- (6) participate in customer research, surveys, or promotions;
- (7) subscribe for email, text, or other messages;
- (8) download or use our Sites;



(9) otherwise communicate information to us.

B. Information We Receive From Third Parties. We may receive information you provide on behalf of third parties, or third parties provide on your behalf, including but not limited to online registrations or employment opportunities with Floteq USA.

We receive information from sources assisting us with (i) updating, enhancing, improving and/or analyzing our records or data; (ii) performing marketing and research services; or (iii) detecting fraud or theft. We may also acquire information about you from third parties with whom we have a relationship or otherwise contract with to obtain such information. In the event we acquire a business, we may receive information from the seller of such business. Additionally, we may receive information from various consumer reporting agencies and related service providers.

C. User Activity Information we collect through these Information Technologies includes internet protocol (IP) addresses, device characteristics (such as connection type, operating system, browser type, screen resolution), location information, user ID, and your interactions with our Sites.

D. Social Media Access. We engage with current and prospective customers through multiple Internet Marketing Channels and social media services (e.g., Facebook, LinkedIn and Twitter). If you contact us on one of our Internet Marketing Channels, request customer service via social media or otherwise direct us to communicate with you via social media, we may contact you via direct message or use other social media tools to interact with you. In these instances, your interactions with us are governed by this Policy as well as the privacy policy of the social media platform you use. If you choose to access, link to, or log-in to our Sites or Internet Marketing Channels or otherwise communicate with us through a third-party social media service, you are granting us permission to access and use the information that you post or store on the applicable social media service in accordance with the privacy policy of that service and the privacy settings that are applicable to your account, and to store the user name and password you use to log-in to the applicable social media service. By accessing or logging into our Sites or Internet Marketing Channels via a social media service, any information you provide may also become accessible to that service, subject to that service's privacy policy. For additional information and more details on how you can manage the information provided to us by these social media services, please review the privacy settings applicable to your account with the applicable social media service. We do not control, and are not responsible for, the privacy practices of such services. Please consult the privacy policy of such services for additional information.

E. Other Information. In addition to collecting Personal Information as described above, we may collect information that does not identify you and is not associated with your Personal Information. We may also de-identify information, so it no longer identifies you. We can aggregate and use such information to engage in marketing and other activities in a manner that does not use customers' personal information and is outside the scope of this Policy.

II. Your Choices

We provide customers with several choices regarding our collection, use and disclosure of personal information:

A. Email Opt-Out. You may unsubscribe to future promotional e-mail communications from FLOTEQ USA by clicking on the unsubscribe link provided in our e-mail communications from such member. In addition, you may use the methods set forth in the "Contact Customer Service" link below to opt-out or update certain preferences. Regardless of your decision to opt-out of promotional e-mail communications, we may still contact you to respond to an inquiry, regarding transactions and for transactional purposes (e.g., product information, service/reminder notices and account maintenance).

B. Disabling Cookies. Based upon your interactions with our Sites and elsewhere on the internet and your (and your device's) interaction with our Internet Marketing Channels, we may personalize your experience via our Sites and via our Internet Marketing Channels. However, you have choices relating to how your device interacts with our Sites and our Internet Marketing Channels. You may choose to access our Sites and our Internet Marketing Channels without accepting certain Information Technologies on your device(s), and you may opt-out or modify certain elements that are tailored specifically to you and served to you based upon your browsing history. If you choose to restrict those Information Technologies, you can still access our Sites and Internet Marketing Channels but may not be able to take full advantage of certain features. You may also manage third party tracking by turning off cookies and changing your browser settings. Learn more at www.allaboutcookies.org.

C. Location Information. When you visit our Sites, they may collect general location information from your IP address and your specific location information (latitude and longitude) from your browser. You may opt-out of allowing our use of specific location information we obtain when you visit our Sites on-line by selecting the option of not allowing us to use location information when prompted by your browser or by managing your browser settings. Note, such opt-outs and browser settings do not limit our ability to use your general location obtained via your IP address.

E. Mobile Device and Application Preferences.

1. Text Messages. If you have opted-in to receive text messages from us, we may send text messages to the number provided that corresponds to your device. To opt out of mobile messaging from a member of the Floteq USA Family of Businesses, reply "stop" to text messages received from such member. This will opt you out of all text message campaigns from that member only.

2. Push Notifications. You may at any time opt out from further push notifications by adjusting the permissions in your mobile device.

3. Location Information. You may at any time opt-out from allowing us to access specific location information of your device by adjusting the permissions in the mobile device you use to

access our Sites and those of our third-party partners through your mobile browser or FLOTEQ USA mobile app.

4. In-App Notifications. All application users receive in-app notifications, or “local notifications” generated by a device trigger. To halt those notifications, you can turn off notifications for the Floteq USA app, discontinue use of the app, or uninstall the app from your mobile device.

5. Updates and Uninstall Mobile Applications. Notification and automatic installation of app updates can be controlled through the preferences of the mobile app “store” specific to your mobile device. You can stop all further collection of information by a mobile app by uninstalling it. You may use the standard uninstall process available as part of your mobile device or via the mobile app marketplace or network. Note that after you uninstall the mobile app from your device, a unique identifier associated with your device may be retained by FLOTEQ USA. If you re-install the app on the same device, we will often be able to re-associate this identifier to your previous transactions and activities.

6. Closing your Account. You may request that your account and information be deleted via the FLOTEQ USA app in the Account settings tab.

III. How We Use Your Information

We use your information consistent with this Policy and applicable laws in the following ways:

1. Fulfilling, delivering, and communicating with you regarding requests for information and/or services.
2. Evaluating your application for employment.
5. Administering surveys, contests, or promotions.
6. Registering and servicing customer accounts.
7. Providing customer service.
8. Conducting research and analysis.
9. Alerting you to product, service, and promotional information, including product recalls.
10. Helping us to improve and customize our products and services, Sites and Internet Marketing Channels.
11. Protecting the security and integrity of our Sites, Internet Marketing Channels and overall business practices.

12. Enabling Organizations, account holders, and others to utilize the features and functionality and Services of our Sites, including facilitating communications among Organization participants and others.

14. As may otherwise be disclosed at the time of collection.

IV. How We Disclose Your Information

1. As we deem necessary in the event (or partial event) of a corporate sale (asset or stock), merger, reorganization, change in corporate control, acquisition, insolvency, bankruptcy or similar event.
2. To comply with applicable law or reasonable request based upon governmental regulation, court order, subpoena or similar related action.
3. As we deem necessary to protect the rights, property or safety of FLOTEQ USA, our customers, our associates or others, to prevent harm or loss, or in connection with an investigation or suspected or actual fraud or other unlawful activity.
4. As may otherwise be disclosed at the time of collection.

V. How to Update Your Information

For certain types of information, we offer you several ways to access or update such information:

1. If you have an account on one or more of our Sites, you can log-in to your account on the applicable Site and update your information and communication preferences provided there. Some fields (such as password) can be Site specific and if you have more than one account with us or registered on more than one Website, you will need to update each account.

Please note:

1. We may refuse requests that are unreasonably repetitive, require disproportionate technical efforts, risk the privacy of others or are impractical.
2. After closing your account(s), or updating or deleting any of your information, we may retain residual copies on our servers and back-up systems to the extent permitted by law.
3. Closing or updating information relating to one FLOTEQ USA account does not guarantee the closing or updating of a separate and different FLOTEQ USA account (e.g., Floteq USA account setup at another Organization's location). If you desire to close or update multiple FLOTEQ USA accounts, please log-in to each specific account to do so, or please contact the applicable Customer Service department associated with each such account.
4. Closing an account will not affect information we obtain via Information Technologies.

5. Closing your account on our Sites may not remove your information that the Organization and its affiliates, or other third parties, add about you to the applicable Sites.

In our efforts to maintain accurate and complete information, we utilize third party service providers to assist us in identifying and with updating contact information (e.g., National Change of Address or NCOA).

VI. Security and Retention

We use a variety of security measures to help protect Personal Information and transactions we process. Our Sites utilize encryption technology to protect Personal Information that we transport across the internet. Customers' online and mobile accounts are password protected with restricted access.

Additionally, we use a variety of security measures to help protect Personal Information that we maintain. While no company can guarantee the security of your information, we use physical, administrative and technical controls that are consistent with retail industry practices to mitigate such risks.

We retain Personal Information based on a number of factors, including (i) for business purposes such as for as long as your account is active, as long as is reasonably necessary to provide you with our products and services, and for the other purposes we use your information as described above, and (ii) as reasonably necessary to comply with our legal obligations, resolve disputes and enforce our agreements. We may also retain archived copies of your information for a reasonable period of time. Please note that information managed by Organizations may also be subject to their retention practices.

VII. Third Party Links

Our Sites and our Internet Marketing Channels may link to other sites that we do not control. In addition, you may have visited our Site through a link or a banner advertisement on another site. In such cases, the site you linked from may collect information from people who click on the banner or link. These other sites are governed by their own privacy policies which you should review when visiting such sites to understand how they collect and use your information. We are not responsible for the privacy practices third party sites.

VIII. Privacy Policy Updates

We may, from time to time, update, and revise this Policy. Please periodically check this Policy for any updates or revisions. In the event we make a material change to how we use your information that would materially adversely affect your rights, we will provide you advance notice including by posting the proposed change on the Sites at least 30 days in advance of the effective date of the changes.

IX. State-Specific Notices.

(A) Consumers who are Residents of California or Virginia

This Section is provided specifically for California and Virginia residents. In addition to the disclosures provided above in this Policy, if you are a California or Virginia resident you can exercise certain additional rights regarding your Personal Information.

Access, Correction and Deletion Requests:

- You may request a copy of the following: (1) the categories of Personal Information we collected about you; (2) the categories of sources from which the Personal Information is collected; (3) the business or commercial purpose for collecting or selling (if applicable) the Personal Information; (4) the categories of third parties with whom we shared Personal Information, and the categories of Personal Information shared; and (5) the specific pieces of your Personal Information that we have collected, used, disclosed, or sold.
- You may request that we (and our service providers) correct your Personal Information if it is inaccurate or delete your Personal Information. Note that deletion requests are subject to certain limitations, for example, we may retain Personal Information as permitted by law, such as for tax or other record keeping purposes, to maintain an active account, to process transactions and facilitate customer requests, and for certain other internal business purposes described in our Privacy Policy.

To request a copy of Personal Information we have collected about you, or to request that your information be corrected or deleted, please submit your request here: support@flotequsa.com (please reference **Privacy Request**). We will aim to complete requests as soon as reasonably practicable and consistent with any applicable laws.

Before submitting any request, please note the following important information:

- You may directly *access* much of your Personal Information if you have an online account with us by logging in to the relevant Site and visiting your account page (e.g., contact information, profile.).
- Likewise, you may directly *correct* some of your Personal Information (as described above in this policy) if you have an online account with us by logging in to the relevant Site and visiting your account page (e.g., contact information). Note that changes made to your account on one of our Sites may not be reflected on other Sites operated by us.
- If you are submitting a *deletion* request, your account will be permanently terminated and personal information on that account will be deleted consistent with any applicable laws. Once your deletion request is processed, you will lose the ability to log into our website(s) and mobile app(s).

Privacy laws may provide you with other opt-out rights which are inapplicable to us. In particular, we do not engage in impactful profiling activities with respect to our customers.

We may not, and will not, discriminate against any customer for exercising their privacy rights, including those provided by the applicable privacy laws. Please note that we may otherwise continue to share your Personal Information with our affiliates and service providers, and as otherwise directed by you, for the purposes described in our Privacy Policy.

(B) Residents of California only

The additional disclosures in this Section are provided particularly for California residents.

(i) For Consumers:

Enumerated categories of information. In at least the past 12 months, we have collected the categories of personal information described above in this Policy, which includes:

- *Identifiers* such as name, email address, IP address, postal address and phone number, such as if you visit our Sites, create an account;
- *Geolocation data* including location enabled services such as WiFi; and
- *Sensitive personal information* such as your account credentials for our Sites.

Do Not Track. Do Not Track (DNT) is a privacy preference you can set in most browsers but there is no standard interpretation or practice for responding to DNT signals (see <https://allaboutdnt.com/> for more information), and we therefore handle all information consistent with this policy. As described above, we do endeavor support browser GPC signals, offer manual cookie opt-out for third party targeting cookies, and you can also opt-out of third party data extracts by submitting an opt-out request.

(ii) For Non-Consumers:

Privacy disclosures and rights requests. California privacy rights apply to all individuals (not just consumers), including job applicants, current and former employees, contractors, and business partners. Due to the nature of these relationships, the collection and use of personal information can vary, but in general terms and in addition to all the disclosures above:

- Job applicants may provide us with personal information as part of an employment application and review process that includes the applicant's contact information, education, and employment history, resume and cover letter. We do not use this information for any purpose other than to evaluate the individual for employment with us and manage our careers program. Job applicants may provide additional information for routine background checks to a third-party provider of such services, under specific privacy terms and consents that will be provided at the time of collection.

- Employees receive disclosures during and after onboarding that provides additional details regarding our employee privacy practices.
- We collect contact information and other personal information reasonably necessary to engage and work with contractors and business partners during a business relationship.

All such individuals who are California residents can request additional information about our privacy practices with respect to their information, as well as make the access, deletion, correction and opt-out requests as described above, by submitting contacting support@flotequsa.com (please reference **Privacy Request**). Please provide sufficient information that we can identify you and be aware that we may employ a more extensive authentication process to verify your identity before responding to your request.

(C) Residents of Virginia only

The additional disclosure in this Section is provided particularly for Virginia residents. If we deny a rights request you submit as provided above, and after you appeal the denial you are unsatisfied with our response, you can raise your concerns with the Virginia Office of the Attorney General.

(D) Residents of Nevada

For Nevada residents, please note that we do not sell personal information as defined by Nevada law (Nevada Revised Statutes, Chapter 603A, Section 1.6). You can submit a request to us at privacy@dcsg.com regarding the sale of such information.

X. International Data Transfers and Use

Our Sites are controlled and operated by us from the United States and are not intended to subject us to the laws or jurisdiction of any state, country or territory other than those of the United States. Any information you provide through use of the Sites may be stored and processed, transferred between and accessed from the United States and other countries which may not guarantee the same level of protection of Personal Information as the one in which you reside. However, we will handle your Personal Information in accordance with this Privacy Policy regardless of where your Personal Information is stored or accessed.