



## PRIVACY NOTICE

### Introduction

This privacy notice describes how ASAP Expediting & Logistics (“ASAP”, “we”, “us”, and “our”) collects, stores, uses, and protects personal data. By using our Services and website, you agree to our processing of personal data that you submit.

### Scope

This Privacy Notice covers all ASAP websites, products and services and the data that is shared with us whether directly, via <https://www.asapexpediting.net> or via email. This Notice provides an explanation as to what happens to any personal data that you share with us, or that we collect from you either directly via these websites or via email. This Notice only applies to Personal Data (as defined below) and other information collected by us from: (i) visitors to our Site and users of our Services, (ii) job applicants and (iii) employees or contractors.

### Personal Information We Collect

This section describes how we receive and use information collected through our Services. For information about how we collect and use information collected through our Site, please see the “Information we Collect Through Our Site” section below. Through our Services we may receive information that, alone or in combination with other information, could be used to identify an individual otherwise known as “Personal Data”.

We may receive information, including Personal Data, when a person interacts with our services. This may include first and last name, address, telephone number, email address, account number, location data, cell phone, unique device identifier and transaction and purchase history. We also may receive the following:

- Gender
- Postal Address
- Telephone Number
- Credit and debit card number or other payment data
- Financial Information in limited circumstances
- Language preference
- National information
- Date and place of birth



## **Personal Information We Share**

ASAP and its third-party service providers (some of which are listed above), including our contractors, cargo attendants and shipping partners, collect Information about you from a variety of sources, including Personal Information you provide directly to us and Information we collect about you when you access and use the ASAP website and Services to transport your product across borders. This section describes how we receive and use information collected. We may receive information that, alone or in combination with other information, could be used to identify an individual (“Personal Data”). We may receive the above information (including Personal Data) when you:

- Create an account with us;
- Fill out our online contact form;
- Request information from us;
- Use our Services;
- Apply for or accept a job with us

Disclosures of Personal Information for Monetary or Other Valuable Consideration or for Business Purposes We have not disclosed any personal information to other businesses or third parties for monetary or other valuable consideration within the twelve (12) months preceding the effective date of this Privacy Notice. We have disclosed personal information in all or substantially all of the categories identified for various business purposes. For more information about the categories of personal information we have disclosed, the categories of entities with which we have disclosed this information and the purposes for which we have disclosed the information, please see “Information We Share.”

For information regarding the purposes for which we collect and use the personal information we collect, please see “How We use Information Collected”.

### **Mobile Phone Information:**

When consumers send and receive SMS messages to or from one of the Services (or integrated tools) that provides SMS functionality, we may receive and maintain information

associated with those messages, such as the phone number, the wireless carrier associated with the phone number, the content of the message, and the date and time of the transaction.

- **Third Party Applications:** ASAP may make third party applications available through our Services. Information received via third party applications includes personal information or information about the application itself. The information collected by ASAP when consumers enable a third-party application is handled under this Privacy Notice.



Information collected by the third-party application provider is governed by their privacy policies.

### **How We Share and Use Information Collected Through our Services**

- **To Provide our Services.** We use the information that we obtain through our Services to provide logistics solutions which are enabled by experienced operational talent and best-in-class customer service. This includes sharing your information with customs officials, carriers, cargo attendants, and other third parties that are necessary to provide our services to you.
- **Aggregated Data.** We may anonymize, de-identify and/or aggregate the information that we collect and use such anonymized, de-identified and/or aggregated data for our own internal business purposes, including but not limited to sharing anonymized and de-identified data with our current and prospective business partners, affiliates, agents and other third parties for commercial, statistical and market research purposes, for example to allow those parties to analyze patterns among groups of people, and conducting research on consumer demographics, interests and behavior.

### **Information Collected Through Our Site**

We collect the following information from you when you visit our Site, including from Site visitors who are interested in learning more about our Services or who are interested in applying for jobs with ASAP:

- **Personal Data** that you provide to us. We may ask you to provide Personal Data for various reasons. For example, when you request information about ASAP, we may ask you for contact information such as your name, email address, phone number, geographic and job information. We may ask you for similar information at other times, such as when you apply for a job through our Site or contact our customer service team. We also collect Personal Data that employees, contractors, or agents of ASAP provide to us when they register for an account with ASAP. The information we may collect includes name, address, company name, location, email address, phone number and account password.
- **Communications.** When you send email or other communications to ASAP, we may keep those communications in order to process your questions, respond to your requests and improve our Site. We may use your email address to communicate with you about our Services.
- **Information Collected Through Cookies, Server Logs, Beacons and other Ad Technologies.** When you visit the Site or access ASAP Services, we may automatically collect information about you through server logs, cookies, beacons and other ad technologies. This information includes your web request, the date and time of your web request, your interaction with a web service, your Internet Protocol address, your browser type, and



the domain name of your Internet service provider. If you can be identified from this information, for example by combination with other pieces of information, then we will treat this information as Personal Data. Please see the information below to learn more about how we use cookies.

### **Disclosure of Data Collected Through the Services or Site**

We share information that we collect, including Personal Data, as described below:

- **Vendors and Services Providers.** To third party vendors and service providers to perform certain functions on our behalf, such as performing specific portions of the Service, maintaining databases, helping us collect job applications, delivering content, sending SMS and emails on behalf of our customers and for our own marketing communications, administering content, mailing information, processing payments or otherwise providing the Services or the Site.
- **Partners and Resellers.** To partners and resellers who provide our Services in connection or in combination with other services they provide, for example ASAP can provide Personal Data and/or aggregated data to those partners and resellers to enable them to provide Services and for monitoring performance metrics.
- **Merger, Acquisition or Financing.** To a successor or affiliate if we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, as part of that transaction along with other assets.
- **As Required by Law.** To satisfy applicable law, regulation, legal process or lawful government request of any country, or to protect the rights, property or safety of ASAP, its users or the public, or to enforce ASAP's Terms and Conditions.

### **Links to Other Websites:**

Our Site may contain links to other websites not operated or controlled by ASAP ("Third Party Sites"). The privacy practices described in this Privacy Notice do not apply to Third

Party Sites. By providing these links we do not imply that we endorse or have revised these sites. Please contact those sites directly for information on their privacy practices and policies.

### **Security**

ASAP has developed or engaged technical and organization measures designed to protect Personal Data against unauthorized access or misuse. However, the Internet cannot be guaranteed to be fully secure, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure.

### **Retention**



ASAP will retain Personal Data for the period necessary to provide our Services, as otherwise required by our contracts or by law.

### **Children Under 13**

Our Services and Site are not directed at children under 13 years of age, and we do not knowingly collect or receive Personal Data from them. If we learn that we have received Personal Data from a child who is under 13, we will delete the data. If you believe that we have received Personal Data from a child under the age of 13, you may contact us at [dataprivacy@asapexpediting.net](mailto:dataprivacy@asapexpediting.net).

### **EU Data Subjects**

This section applies if you are an EU data subject (for these purposes, reference to the EU also includes the European Economic Area countries of Iceland, Liechtenstein and Norway and, where applicable, Switzerland). ASAP is the data controller for processing Personal Data provided to ASAP through the Site. We act strictly as a data processor for Personal Data that we process through the Services, as described under the “**Information Collected Through our Services**” section above. We rely on the following legal bases for processing your Personal Data:

- Processing of your Personal Data that you provide to us when you send inquiries about our Services is necessary to respond to or implement your request prior to entering into a contract with us.
- When you apply for employment through our Site, processing of your contact details and data about your employment history and education (as needed to evaluate your job application, to conduct job interviews, and as is otherwise needed for recruitment) is necessary to respond to your request to process your application for employment. If you do not provide this data, we will not be able to process the application that you send through our Site.
- We use account-related data to set up accounts for users in our platform and to administer and support those accounts (such as usernames, email address and billing information), provide you with access to the Services, contact you regarding your use of the Services or to notify you of important changes to the Services. Such use is necessary for the performance of the contract between you and us.
- We will send you information by email on our new services or other promotions only with your consent. If you do not provide us with your consent to the processing of your Personal Data for this purpose, we will not send you this information. You have the right to withdraw your consent at any time as described below.
- Our use of data relating to your use of the Site and/or the Services, described above, is necessary for our legitimate interests in understanding how the Site and the Services are being used by you, to improve your experience on it and our service offerings. We have also a legitimate interest in aggregating and/or anonymizing the information that we

collect through our Site and/or the Services and using this information for our business purposes, as described above. When we process your Personal Data for our legitimate interests, we make sure to consider and balance any potential impact on you, and your rights under data protection laws. Our legitimate business interests do not automatically override your interests – we will not use your Personal Data for activities where our interests are overridden by the impact on you, unless we have your consent, or those activities are otherwise required or permitted to by law. You have the right to object to processing that is based on our legitimate interests, as further described below.

Subject to applicable law, you have the following rights in relation to your Personal Data:

- **Right of access:** If you ask us, we will confirm whether we are processing your Personal Data and, if so, provide you with a copy of that Personal Data (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.
- **Right to rectification:** If your Personal Data is inaccurate or incomplete, you are entitled to have it rectified or completed. If we have shared your Personal Data with others, we will tell them about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.
- **Right to erasure:** You may ask us to delete or remove your Personal Data and we will do so in some circumstances, such as where we no longer need it (we may not delete your data when other interests outweigh your right to deletion, for example if we are required by law to keep it). If we have shared your data with others, we will tell them about the erasure where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.
- **Right to restrict processing:** You may ask us to restrict or 'block' the processing of your Personal Data in certain circumstances, such as where you contest the accuracy of that Personal Data or object to us processing it. We will tell you before we lift any restriction on processing. If we have shared your Personal Data with others, we will tell them about the restriction where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.
- **Right to data portability:** Effective 25 May 2018, you have the right to obtain your Personal Data from us that you consented to give us or that is necessary to perform a contract with you. We will give you your Personal Data in a structured, commonly used and machine- readable format. You may reuse it elsewhere.
- **Right to object:** You may ask us at any time to stop processing your Personal Data, and we will do so if we are processing your Personal Data for direct marketing and otherwise.

However, if we are relying on a legitimate interest to process your Personal Data and we demonstrate compelling legitimate grounds for the processing we may continue; or\*

- **Rights in relation to automated decision-making and profiling:** You have the right to be free from decisions based solely on automated processing of your Personal Data, including profiling, which produce a significant legal effect on you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us, or with your explicit consent.
- **Right to withdraw consent:** If we rely on your consent to process your Personal Data, you have the right to withdraw that consent at any time. Your withdrawal of consent will not affect apply to data that was processed prior to our receipt of your withdrawal of consent. Right to lodge a complaint with the data protection authority: If you have a concern about our privacy practices, including the way we have handled your Personal Data, you can report it to the data protection authority that is authorized to hear those concerns.
- **Right to lodge a complaint with the data protection authority:** If you have a concern about our privacy practices, including the way we have handled your Personal Data, you can report it to the data protection authority that is authorized to hear those concerns.

\*You may exercise your rights by contacting us as indicated under “Contact Us”.

### Where is My Data Stored?

We (and many of our external third parties) are based outside the European Economic Area (EEA) so their processing of your personal information will involve a transfer of data outside of the EEA.

Whenever we transfer your personal information outside of the EEA, we ensure it is protected by making sure at least one of the following safeguards is in place:

- by transferring your personal information to a country that has been deemed to provide an adequate level of protection by the European Commission.
- by using specific contracts approved by the European Commission which give your personal information the same protection it has within the EEA; and
- where we use providers based in the US, we may transfer data to them if they provide similar protection to personal data shared between Europe and the US as if it never left Europe.

To keep this privacy policy as short and easy to understand as possible, we have not set out the specific circumstances when each of these protection measures are used. You can contact us at [dataprivacy@asapexpediting.net](mailto:dataprivacy@asapexpediting.net) for the details as to how we protect specific transfers of your data.



All information you provide to us is stored on our secure servers or those of our third-party data storage providers. Notice for California Data Subjects This part of our Privacy Notice applies to consumers who reside in California.

### **Your California Privacy Rights**

If you are a California resident, you have the following rights. We will honor requests received to the extent required by applicable law and within the time provided by law.

Personal Information we Collect about California Consumers We describe the personal information we have collected from consumers in the twelve (12) months preceding the effective date of this Privacy Notice in the part of our Privacy Notice titled, "Information We Collect" above. The information we collect includes the following:

- Identifiers such as name, address, email address, phone number, login information, social media account information, unique customer id number.
- The following categories of personal information described in California Civil Code §1798.80(e): (1) the personal information listed in the preceding bullet point as "identifiers," and (2) the other information that identifies, relates to, describes, or is capable of being associated with a particular individual such as state or national identification card, education, employment, employment history, bank account number, credit card number, debit card number or other financial information.
- Characteristics of protected classifications under California or federal law such as race, sex/gender, age, marital status, national origin.
- Commercial information, including information about orders or purchases of any of our products or services; registration information, and information you provide or submit to us when you ask us to import/export your cargo which is necessary to transfer goods across country borders.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with our websites, mobile apps, advertisements that we display on our websites or mobile apps or on third party sites and apps, or ASAP pages or accounts on any third-party social media platforms.
- Geolocation data.
- Audio information from calls placed with customer service and accounting centers which may be reported, and electronic information in the form of Internet or other electronic network activity information described above.
- Professional or employment related information in the form of business contact information such as name, company name, physical address and email address and telephone or fax number.



- Inferences drawn from (1) the information we collect when you visit our websites, tools, widgets and plug-ins, (2) information we collect, including through third-party suppliers, regarding content and other data posted on the Internet (such as public locations on the Internet), and (3) information about consumers preference and behavior that we collect on our websites and mobile apps or purchase from third parties in order to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.

Right to Access and Information Regarding Personal Information You have the right to request that we disclose to you the categories and specific pieces of personal information we have collected about you in the preceding 12 months, how we used the information we have collected, who we categorically disclosed your information to, and whether we have sold that information. Once we verify your identity, we will deliver the information that we are required by law to disclose to you, in the manner required by law, within 45 days after receipt of a request. We will notify you if we require additional time to respond, in which case we will respond within such additional period of time required by law. We may deliver the personal information to you through your account, if you maintain an account with us, or electronically, or by mail at your option. If electronically, then we will deliver the information in a portable and, to the extent technically feasible, in a readily usable format that allows you to transmit the information from one entity to another without hinderance.

#### **Right to Deletion of Personal Information**

You have the right to request that we delete Personal Information about you that we have collected from you.

#### **Right to Opt Out**

You have the right to opt out of the disclosure of personal information about you for monetary or other valuable consideration. We do not currently disclose personal information for monetary or other valuable consideration, but you may contact us to let us know that you would like to Opt-Out of the Selling of your personal information should our practices change by emailing [dataprivacy@asapexpediting.net](mailto:dataprivacy@asapexpediting.net).

#### **Right to No Discrimination**

We may not discriminate against you because of your exercise of any of the foregoing rights under the California Consumer Privacy Act, including by:

- Denying you goods or services;
- Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;

- Providing you a different level or quality of goods or services; or
- Suggesting that you will receive different price or rate for goods or service or at a different level or quality of goods or services.
- We may however, charge different prices or rates, or provide a different level or quality of goods or services, if that difference is reasonably related to the value provided to us by your personal information.

Requests to Exercise Your Rights You may request to exercise the foregoing rights by:

- Submitting a request to [dataprivacy@asapexpediting.net](mailto:dataprivacy@asapexpediting.net)
- Calling us toll-free at 800-496-2206

Please note that we may take steps to verify your identity before granting you access to information or acting on your request to exercise your rights, as required or permitted by law.

We may limit our response to your exercise of the above rights as permitted by law.

### **Data Sharing for Direct Marketing Purposes**

California Civil Code § 1798.83 further permits California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. If you are a California resident, you may ask us to refrain from sharing your personal information with certain of our affiliates and other third parties for their marketing purposes. Please tell us your preference by contacting us as specified below.

### **Do Not Track**

At this time, there is no worldwide uniform or consistent industry standard or definition for responding to, processing, or communicating Do Not Track signals. Thus, we are unable to respond to Do Not Track signals.

### **Use of Cookies**

We may use “cookies” (a small text file sent by your computer each time you visit our site) or similar technologies to record log data. Many browsers default to accepting cookies. You may be able to change this setting in your browser and you can also clear your cookies. If you do, you may lose some functionality of our site. Check your browser’s help function to learn more about your cookie setting options. We may use the following types of cookies:

- Advertising and analytics
- Essential cookies
- Functionality cookies
- Social Media cookies
- Advertising cookies

- Please see below for your choices on cookies in the use of advertising.
- To help us make e-mails more useful and interesting, we often receive a confirmation when you open e-mail from us if your computer supports such capabilities. You can opt out of receiving emails from us. Please see the Your Choices section below.
- We might also use a pixel tag which is a small graphic file that allows us and third parties to monitor the use of the site and provide us with information based on your interaction with the site. These tags may collect the IP address from the device which you loaded the page, the browser type. Pixel tags are also used by our third parties to collect information when you visit our site, the links and other actions you take on our site, and we may use this information in combination with cookies to display targeted advertisements.
- Other data technologies may be used that collect comparable information for security and fraud detection purposes. If you have any questions about cookies you can go to [www.youronlinechoices.com/uk](http://www.youronlinechoices.com/uk) or to generally find out more about cookies, visit this site; <https://www.allaboutcookies.org/>

### Your Choices

On most web browsers, you will find a “help” section on the toolbar. Please refer to this section for information on how to receive a notification when you are receiving a new cookie and how to turn cookies off. Please see the links below for guidance on how to modify your web browser’s settings on the most popular browsers:

- Internet Explorer Privacy Policy [www.asapexpediting.net](http://www.asapexpediting.net)
- 13 Mozilla Firefox
- Google Chrome
- Apple Safari

Note, however, that if you reject our request to use cookies or turn cookies off, you may be unable to access certain parts of the Site and you may not be able to benefit from the full functionality of the Site. To find out more about cookies and similar technologies, including how to see what cookies and similar technologies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org), and/or [www.youronlinechoices.com](http://www.youronlinechoices.com), and/or the Network Advertising Initiative’s online resources, at <http://www.networkadvertising.org> and follow the opt-out instructions there or if located in the European Union, visit the European Interactive Digital Advertising Alliance’s Your Online Choices opt-out tool . By opting out of targeted advertisements you will no longer see advertisements on our Site from third-party partners that participate in the Digital Advertising Alliance; however, you may still continue to see other non-targeted advertisements on our Site. If you access the Site on your mobile device, you may not be able to control tracking technologies through the settings.



## Changes to this Privacy Notice

We may change this Privacy Notice at any time. We will post all changes to this Privacy Notice on this page and will indicate at the top of the page the modified Notice's effective date. We therefore encourage you to refer to this page on an ongoing basis so that you are aware of our current privacy Notice. If required by the applicable law, we will notify you if the changes. By continuing to use the Site and/or the Services or providing us with information following such a replacement Notice being uploaded, you agree that you will be deemed to have agreed to be bound by the Privacy Notice as changed.

## Contact Us

If you have any questions or suggestions regarding this Privacy Notice, please contact us by email [dataprivacy@asapexpediting.net](mailto:dataprivacy@asapexpediting.net) or send postal mail to:

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100 Commerce Dr NE  
Columbia, SC 29223  
U.S.A. Phone: +1 877-888-2727  
Attn: [dataprivacy@asapexpediting.net](mailto:dataprivacy@asapexpediting.net)