

# LOAD&ROAD Privacy Policy

## Overview

Your privacy and trust are important to us. This Privacy Policy explains the types of personal information and data (hereinafter “personal data”) that we may collect and hold, how that personal data is used and with whom the personal data is shared. You will find contact information at the end of this Privacy Policy if you have any queries or concerns.

LOAD&ROAD INC. (hereinafter “LOAD&ROAD”, “we”, “us” or “our”) is the company responsible for any personal data collected or received by LOAD&ROAD arising from your use of any LOAD&ROAD products, services, applications and websites made available to you. LOAD&ROAD is also responsible for ensuring that the handling of personal data complies with this Privacy Policy.

Our products and services evolve constantly, and we will adjust this Privacy Policy to accurately describe what personal data we collect, how we use it and with whom we are sharing the personal data, as well as if required to comply with changes in applicable laws. If we make changes to this policy, we will change the last-updated date (see top) and update this page. If we make material changes, we will notify you as required by law. Please check from time to time what changes we have made.

## 1. Personal data that we collect

LOAD&ROAD may collect personal data about you in several different ways. We may collect information directly from you, automatically from your device, or from third parties. The ways in which we collect information are further explained below. Please take care when submitting personal data to us.

### A. Personal data that you provide us

Whenever you interact with products from us, you may be asked to provide us with personal data relating to you. For example:

- Some of our applications or services may require you to create an account. When creating your account(s), we may ask you to provide a range of personal data, such as your name, date of birth, location, contact details, applicable device ID(s) relating to the devices you are using to access and receive particular applications and services, interests and account and your current mobile network operator
- When you use our applications and services or other platforms, we may receive content that you choose to upload, such as product reviews, comments, photos and forum posts, or details of your interests and preferences that you choose to tell us about when, for example, selecting the services that you wish to receive. Further, use of applications with voice recognition may require us to access certain personal data on your device and also record your voice
- When you specify interests and preferences during setup of products or service from us

## B. Personal data we collect when you use our websites, products, services and applications

In order to improve and provide a better user experience, some of our websites, internet-enabled products and applications and services provide us with personal data about your use of them, including:

- Details of your usage patterns, content that you view and interact with including personal data on the services and applications you are using on-device to personalise services to your specific needs
- Device information and service, product or server logs which hold technical personal data about your use of our service, product or websites, such as your IP address, device ID(s), domain, device and application settings, errors and hardware activity. We may use your IP address to determine your location/country of origin. Your device ID is also collected when you download a software update
- Location information including personal data about where your device is physically located. For example, when you are using a geo-location service or application and you have given consent to your location being shared
- With your explicit consent, personal data related to your physical behavior or health
- Voice recognition and utterance data when using a voice command application. Such data may be sent to our technology partners
- C. Personal data we collect in relation to social networks
- If you use any of our social network features, pages or plug-ins, or you use our products or services that allow interaction with social networks, we may receive personal data relating to such use. For instance:
- If you log in to one of our websites, applications or services using your social network account, we may receive basic details from your social network profile. The basic details we receive may depend on your social network account privacy settings. Typically; however, they might include your social network ID, name, profile picture, gender and locale. We may also receive additional personal data from your profile if you give us permission to access it
- If you 'like' or similar one of our pages on a social network site, we may receive personal data about your social network profile, depending on your social network account privacy settings

For more information and for details about how you can control access to your social network profile, you should view the privacy policy and other guidance available on your social network's website.

## 2. How LOAD&ROAD uses your personal data

LOAD&ROAD uses the personal data you provide or which we collect mainly for these purposes:

### A. Service provision

We may use data we have collected, including personal data, to:

- provide you with a product or service you have requested, including any back-up and restore service
- process your registration with us or create an account
- provide you with required notices and software updates which may contain critical security and functionality patches that make your device more secure and protect the personal data on the device
- send important information (including via text message, push notifications, email) regarding essential software updates, changes to applicable terms and conditions and/or other communications or notifications as may be required to fulfil our legal and contractual obligations to provide warranty

## B. Product and service development

We work constantly to develop and improve our products and services to better meet customer requirements, to ensure quality, and to strengthen network and information security. We may use personal data to:

- create and manage customer database(s) of our users, including basic account information (such as your name, date of birth, address, contact details), applicable device ID(s) (relating to the devices you are using to access and receive particular applications and services), related product or service usage information and customer preference information as provided by you from time to time. As part of our on-going customer relationship management activities, we may consolidate several databases into one or otherwise link separate databases to more effectively manage your accounts
- improve and enhance existing LOAD&ROAD products, services and applications and develop new offerings in general
- C. Personalization
- We may use personal data to personalize your customer experience. In particular, we may:
  - show you personalized content, recommendations and advertisements. You may notice this personalization when you use LOAD&ROAD products and services and when you visit our own and third-party websites that show advertisements from us or our advertising partners. For example, you might see an advertisement for a product that you have recently viewed on one of our websites. Some of the personalization that you see on our websites or in our online advertisements makes use of cookies set by us or our third-party advertising partners. In other cases, our applications and services may have specific settings to control personalized content; you should consult the applicable terms and conditions of the relevant application or service for more information
  - use product reviews, comments or content you have uploaded and made publicly visible in our websites or services to link to, publish or publicise elsewhere. Each time you create or reply to a post or thread on a website forum from us, in addition to providing this forum service, we may also record the forum name and the time and date of your post or thread with your account details. We do this to better understand the 'typical users' of our forums.

- If you want to know more about tracking and cookies and how to opt-out, see section 7 below for more details.

#### D. Fraud prevention and investigation

LOAD&ROAD may use personal data to prevent fraud and to investigate violations of our policies. We may use personal data to comply with applicable laws, regulations and court orders and to comply with valid legal information requests from such bodies. We may use your personal data to enforce or defend the legal rights of LOAD&ROAD or the terms and conditions of any LAOD&ROAD product or service.

#### E. Other purposes

We may use your personal data for other purposes:

- to link or combine the personal data that we collect from the different sources outlined above. Personal data may be linked via a unique identifier, such as a cookie or account number.
- alternatively, we may decide to combine two or more databases into a single database of customer information. We may link or combine personal data for your and/or our convenience (for example, to allow you to more easily register for a new service) and to provide you with better, personalised services and content

### 3. Sharing your personal data

#### A. Sharing of personal data by LOAD&ROAD

In general, LOAD&ROAD does not disclose personal data about you to third parties without your explicit consent. However, there are exceptions:

- Other LOAD&ROAD group companies - We may disclose personal data about you including basic account information (such as your name, email address, address, contact details), applicable device ID(s) (relating to the devices you are using to access and receive particular applications and services), related product or service usage information and any customer preference information as provided by you from time to time) to other LOAD&ROAD group companies where:
  - you have linked your accounts, as further described in Section 4
  - we have engaged such other LOAD&ROAD group companies to provide data processing services to us (and these other LOAD&ROAD group companies will only process your personal data in accordance with our instructions and shall be subject to appropriate confidentiality and security obligations)
  - you use your LOAD&ROAD devices and/or applications or services to access, purchase or download content, services, applications or products that are published, developed, supported or offered by other LOAD&ROAD group companies. They may combine this personal data with other details they hold about you. Unless they provide you with their own privacy policy, they may use your personal details for the purposes explained in this Privacy Policy.

Where you have multiple accounts with different LOAD&ROAD group companies, these LOAD&ROAD group companies may also share personal data with us in accordance with their own privacy policies

- LOAD&ROAD transfers a portion or any part of our business to another LOAD&ROAD group company
- Our service providers - We may use other LOAD&ROAD group companies and/or third-party service providers to provide certain data processing services for us. Examples of authorized data processors could include data analytics providers who process personal data on our behalf for the purposes outlined above. For example, we may use the services of third parties to send update or other important product messages (by SMS or email) or provide back-up services.
- Legal and business purposes - We may use and/or disclose personal data to third parties:
  - when we have a good faith belief that sharing the personal data with government bodies and law enforcement agencies is necessary to prevent fraud, to comply with applicable laws, regulations and court orders and to comply with valid legal information requests from such bodies
  - when we are defending or enforcing the legal rights of any LOAD&ROAD group company or the terms and conditions of any LOAD&ROAD product or service and sharing the personal data with third parties, including professional advisors, will be beneficial for our legal position
  - in connection with a corporate event such as a merger, business acquisition or insolvency situation, when sharing the personal data with a prospective third-party purchaser or seller, and its and our professional advisors, is necessary
- Anonymous statistics - We prepare anonymous, aggregate or generic data (including “generic” statistics) for a number of purposes as outlined above. As we consider that you cannot reasonably be identified from this information, we may share it with any third party, such as our business partners or industry bodies.

## B. Sharing of personal data provided by you

Some of our applications and services may allow you to upload and share messages, photos, video and other content and links with others and/or create a publicly accessible profile for your account. For example:

- The communities and forums area (where applicable) of our websites allows you to post comments (with your account name), which are visible to other users of that service

Other services may allow you to share a link which if clicked on may allow the recipient to access your uploaded content.

## 4. International transfers of your personal data

For the purposes explained in this Privacy Policy, your personal data (including your linked account details) may be transferred to LOAD&ROAD group companies (including service providers operating on their behalf) and other third parties in countries which do not have the same level of data protection laws as those in the country, state or territory where you

are located. LOAD&ROAD uses a variety of legal mechanisms to help ensure that your rights and protections will travel with your data. This is why each of those LOAD&ROAD group companies (and their authorised data processors) will comply with LOAD&ROAD's internal policy relating to processing of personal data ensuring adequate level of protection of personal data.

## **5. Security of your personal data**

While LOAD&ROAD can't guarantee that unauthorized access will never occur, rest assured that we take great care in maintaining the security of your personal data to prevent unauthorized access to it, through the use of appropriate technology and internal procedures. We take a number of steps to protect your personal data from unauthorized access, use or alteration and unlawful destruction and disclosure.

Does this Privacy Policy extend to third party websites visited when following links on our website(s)?

Some of our websites may contain links to other third-party websites that are not operated by LOAD&ROAD, including websites operated by other LOAD&ROAD group companies. While LOAD&ROAD tries to link only to sites that share LOAD&ROAD's high standards and respect for privacy, we are not responsible for the content, security or privacy practices of those third-party websites. We strongly encourage you to view the privacy and cookie policies displayed on those third-party websites to find out how your personal data may be used.

## **6. Cookies & Tracking**

What are cookies and how are they used?

Our websites use industry-wide technologies, such as "cookies", to collect information about the use of our websites and email communications. For instance, these technologies may tell us which visitors clicked on key elements (such as links or graphics) on a website or email and recognise your browser the next time you visit our websites. Cookies allow us to customise your experience to better match your interests and preferences, or to simply facilitate your signing in to use the services. Most browsers will allow you to erase cookies from your computer hard drive, block acceptance of cookies or receive a warning before a cookie is stored. However, if you block or erase cookies, we may not be able to restore any preferences or customization settings you have previously specified, and our ability to personalize your online experience would be limited. Please refer to your browser instructions to learn more about these functions. Your browser settings may allow you to automatically transmit a "Do Not Track" signal to websites and online services you visit. However, how browsers communicate "Do Not Track" signals is not uniform, and there is no standard application.

Also note that third parties may collect personal data about your online activities over time and across different websites when you visit our websites or other online websites and services.

## **7. Retention of your personal data**

We will only retain your personal data for as long as is reasonably necessary for the various purposes set out in section 2 above or to otherwise comply with any applicable laws and regulations concerning the mandatory retention of certain types of personal data relating to our customers and/or any commercial transactions with them. Should any personal data held by us no longer be required by us for any of the purposes set out in section 2 above, we undertake to take reasonable steps to destroy or de-identify any personal data after a reasonable period of time has elapsed. If you are concerned that we have not complied with your legal rights or applicable privacy laws, you may contact your local data protection authority.

## **8. CALIFORNIA PRIVACY NOTICE**

### **Our Practices Regarding Collection and Use of your CA Personal Information**

If you reside in California, we are required to provide additional information to you about how we collect, use and disclose your information, and you may have additional rights with regard to how we use your information. We have included this California-specific information below.

### **A. CA Personal Information**

Consistent with the “Personal data that we collect” section, we may collect the following categories of information about California residents (“CA Personal Information”) for the purposes described in the “How LOAD&ROAD uses your personal data” section of this Privacy Policy, specifically:

- Personal Identifiers: such as name, mailing address, telephone number, email address and similar identifiers
- Other Identifiers: such as Device IDs, IP address, or other unique identifiers;
- Commercial Information: such as product or service types or applications purchased or obtained, or transaction information;
- Internet or Other Electronic Network Activity: such as device data and connected device information, operating system, screen views, traffic to and from applications, other standard connectivity information;
- Geolocation Data: such as data about your location, if you use location-based services;
- Other Consumer Characteristics: such as demographics (e.g., gender, age, profession or job title, etc.), and inferences drawn from collected information

### **B. Sources of CA Personal Information**

Consistent with the “Personal data that we collect” section above, we may collect CA Personal Information from the following sources:

- Directly from you: such as when you voluntarily provide CA Personal Information to us when activating a product or registering an account, or when it is collected automatically from your LOAD&ROAD product;
- Third-Party Business Partners: such as retail stores or mobile network operators;
- Third-Party Applications: such as social networks or other blogs or chatrooms.

### C. CA Personal Information Sold or Disclosed For Business Purposes

- Sharing your CA Personal Information for Business Purposes: In the preceding twelve months, we may have shared the following categories of CA Personal Information for business purposes: Personal Identifiers, Other Identifiers, Commercial Information, Internet or Other Electronic Activity, Geolocation Data and Other Consumer Characteristics. This information may be shared with LOAD&ROAD group companies, third party business partners or legal authorities for the purpose of providing services to you, for product development, monitoring and quality assurance, managing and delivering communications, for legal compliance or to protect legitimate interests, in compliance with law.
- Sale of CA Personal Information: We do not “sell” (as defined under the California Consumer Privacy Act) any categories of CA Personal Information.

### D. California Consumer Rights

Subject to certain exceptions, as a California resident, you may have the following rights with respect to your CA Personal Information:

- Access: Request access to your CA Personal Information that we have collected, used or disclosed within the preceding 12 months;
- Deletion: Request deletion of your CA Personal Information; and
- CA Personal Information Disclosed for Business Purposes: Request information about the CA Personal Information we have disclosed for business purposes within the preceding 12 months.

Please note, if you request deletion of your CA Personal Information, to the extent permitted by applicable law, we may be required to retain some of your CA Personal Information, and certain CA Personal Information is strictly necessary in order for us to fulfill the purposes described in this Privacy Policy. If you wish to exercise a right listed in this section, you may submit a request here: [Data Requests](#).

### E. Exercising Your Rights

If you are a California resident and wish to exercise any of these rights, please: (a) access the webform applicable to your request as described above, (b) contact us by sending an email to [info@load-raod.com](mailto:info@load-raod.com). When submitting your request, you must include your first and last name, email address, and zip code or mailing address. You may be asked to provide additional proof of identification so that we can verify your identity and validate the



request. Please note that you are limited by law in the number of requests you may submit per year.

We will not discriminate against you by offering you different pricing or products, or by providing you with a different level or quality of products, or in connection with any promotion or other offering, based solely upon you exercising your rights with respect to your CA Personal Information.

Authorized Agents: To the extent that you elect to designate an authorized agent to make a request on your behalf, they must provide appropriate documentation including written signed permission from you, proof of your identity, and verification of their identity; or a valid, designated power of attorney as required under the California Probate Code. We may require additional proof of authority or may need to contact you directly to validate the request.

Additional Notice to California Residents:

If you are a California resident, under the California "Shine the Light" law, you have the right to receive: a) information identifying any third party company(ies) to which we may have disclosed, within the past year, personal information pertaining to you and your family for that company's direct marketing purposes; and b) a description of the categories of personal information disclosed. To obtain such information, please email your request to [info@load-road.com](mailto:info@load-road.com), and include your name, email address, and a reference to "Your California Privacy Rights." We are not responsible for requests that are not labeled or sent properly, or do not have complete information.

## **9. Specific Notices**

Other State Rights / Notice to Nevada Residents

If you are a Nevada resident, you have the right to opt-out of the sale of certain personally identifiable information we have collected about you to third parties. We do not currently sell your personally identifiable information as those terms are defined under Nevada law. However, if you wish to submit a request to opt-out of the sale of such information if we were to engage in such a sale in the future, you may submit your request in writing to: [info@load-road.com](mailto:info@load-road.com). Your request must reference your Nevada rights and include your name, mailing address, zip code, and email address. We are not responsible for requests that do not come through the designated request mechanism or do not contain sufficient information to allow us to process your request. We will respond to valid requests within 60 days.

## **10. Contact us**

If you have any concerns about our practices regarding your data, please contact us:  
Email [info@load-road.com](mailto:info@load-road.com)