PILOT FREIGHT SERVICES PRIVACY POLICY

EFFECTIVE DATE: January 1, 2020

LAST UPDATED: December 17, 2019

Pilot Freight Services ("Pilot" or "we") respects your privacy and is committed to protecting your personally identifiable information ("PII") that may be collected through your use of our website https://www.pilotdelivers.com or our “Pilot Navigator” mobile application, (collectively, “Site”), either as a visitor to the Site or if you use the Site in conjunction with our freight services ("Services"). This privacy policy ("Policy") describes how we collect, use, and share your PII on this Site.

Please read this Policy carefully. By using our Site, you agree to our collection, use, and sharing of your PII as described in this Policy.

Information that We Collect

Through your use of our Site and Services we may collect PII, which is information that identifies you as an individual or relates to you as an identifiable individual. PII may include, but is not limited to, your first and last name, home or business address, email address, and telephone number. We collect the following types of information:

Information Provided by You:

Pilot collects PII from you when you use our Site and Services. While we do not require you to provide PII in order to navigate our Site, we must collect certain PII if you choose to use our Services. This includes payment information, sender information, and recipient information. We also collect PII if you register for a CoPilot account, upload information to the Electronic Data Interchange ("EDI"), fill out the request information form, or otherwise provide us with PII in any correspondence. This may include any of your questions, comments, or suggestions or if you fill out a survey.

Device and Usage Information:

We may automatically collect the following types of information as you use our Site:

- **Usage Information:** We collect certain information automatically through your use of the Site, such as which of the pages on our Site that you access, the frequency of access, and what you click on while on our Site.
- **Location Information:** We may collect information about your actual location which may be determined from: IP address, GPS, and other sensors that may reveal information on
nearby devices, Wi-Fi access points, and cell towers.

Device Information: We may collect information about the device you are using such as: hardware model, operating system, application version number, browser, and IP addresses.

- **Mobile Device Information:** In addition to the Device Information listed above, when you access our Site via a browser on your mobile device or through the use of our mobile application, we may also collect mobile network information including telephone number, the unique device identifier assigned to that device, mobile carrier, operating system, and other device attributes.

**Cookies and Other Tracking Technologies:**

A cookie is a small text file that is stored on a user’s computer for record-keeping purposes.

- **Session Cookies:** We use session cookies to make it easier for you to navigate our Site. A session ID cookie expires when you close your browser.
- **Persistent Cookies:** Persistent cookies remain on your hard drive for an extended period of time and may store a password or track and target the interests of users navigating the Site. We do not currently use persistent cookies. If you reject cookies, you may still use our Site, but your ability to use some areas of our Site may be limited.

We may also use other website or mobile tracking technologies to identify you and keep track of your preferences, prevent fraudulent activity or improve Site security, assess the performance of the Site, and deliver content to you based on your interests on our Site and third-party websites.

**Aggregate Information:**

Statistical or aggregated information does not directly identify you or any specific person, but it may be derived from your PII. For example, we may aggregate PII to calculate the percentage of users in a particular ZIP code.

**Third Party Data Collection**

Some content or applications on the Site may be provided by third parties, including analytics companies and advertising providers. Our Site also includes social media features, such as the Facebook “Like” button and other widgets, such as the “Share” button or interactive miniprograms provided by third parties. These third parties may use cookies or other tracking technologies to collect information about you when you use our Site. The information they collect may be associated with your PII or they may collect information, including PII, about your online activities over time and across different websites and other online services.
We do not control these third parties’ tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. Some of these third parties may provide you with ways to choose not to have your information collected or used for targeted advertising. For example, some of these companies are members of the Network Advertising Initiative (“NAI”), which provides a single location where you can opt out of receiving targeted ads from member companies. To opt out, please visit the NAI’s website at https://optout.networkadvertising.org/?c=1

One of the third party services that we use is Google Analytics, which is a web analysis service provided by Google. Google utilizes the data collected to track and examine the use of our Site and may share this data with other Google services. We have enabled Google Analytics Advertising features, including Remarketing, so Google may use the data collected to contextualize and personalize the ads of its own advertising networks. We also utilize AdWords. You can learn more about Google’s privacy practices and any opt out options by visiting their website at https://policies.google.com/technologies/partner-sites

**Do Not Track**

The Site is not currently configured to respond to Do Not Track signals sent by Internet browsers.

**How We Use and Share Information**

We use the PII we collect in the following ways:

- **Communicate**: We use PII to communicate with you about our Site or Services. We may also use your PII to send you account updates or other communications regarding your account or to inform you of any changes to our Site or Services.
- **Specific Purposes**: You may be asked to provide information for a specific purpose. For example, if you would like to use Quick Track to track a shipment or if you need to file a claim of shipment loss or damage, you will be asked for certain information. We will only use the information that you provide for the purpose for which you provided it to us.
- **Customer Support**: We may use your PII to provide you support or other services you request. For example, we may need your information in order to provide technical support or answer questions about our Site or Services.
- **Site Maintenance**: We analyze how our users interact with our Site in order to maintain and improve our Site. We also use information that we collect to diagnose any problems with our Site.

We reserve the right to share information, including PII, with third parties, as described below:
• **Service Providers:** We may share information with service providers that help us perform Site functions and process your transactions. For example, we share information with our EDI providers.
• **Affiliates and Franchises:** We may share information with a parent company, franchisees, subsidiaries, joint ventures, or other companies under common control with us.
• **Corporate Structure:** We may share information in connection with a merger, acquisition, consolidation, change of control, or sale of all or a portion of our assets or if we undergo bankruptcy or liquidation.
• **To Prevent Harm:** We may share information if we believe it is necessary in order to detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights, property, or personal safety of any person.
• **As Required By Law:** We will share information where we are legally required to do so, such as in response to court orders or legal process, to exercise our legal rights, to defend against legal claims or demands, or to comply with the requirements of any mandatory applicable law.
• **With Your Consent:** We may request your permission to share your PII for a specific purpose. We will notify you and request consent before you provide the PII or before the PII you have already provided is shared for such purpose.

**Updates to Your Personal Information**

If your PII changes, you may correct or update your PII by contacting Pilot National Customer Service or your local Pilot station.

**Security**

The security of your PII is important to us. We maintain reasonable physical, technical, and administrative security measures to protect and limit access to your PII. No method of transmission over the Internet or electronic storage technology is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your PII, we cannot guarantee its absolute security.

**Limits to Other Websites**

The Site may contain links to third party websites that are not owned or controlled by Pilot, such as government websites. We have no control over the content, privacy policies, or practices of any third party website. You are subject to the policies of those third party websites where applicable. We encourage you to review the privacy policies of these third party websites before you disclose your PII.

**Children’s Privacy**
Our Site is not intended for use by children. We do not knowingly collect PII from children under the age of 13 years. If we become aware that a child under 13 has provided us with PII, we take immediate steps to delete such PII.

Applicable Law

This is a United States-based Site that is subject to U.S. law. This Site is controlled, operated, and administered by Pilot from its offices within the U.S. If you are accessing this Site from a location outside the U.S., you hereby agree that your use of this Site and our collection and use of your PII is subject to this Policy.

California Privacy Rights

If you are a California Consumer, you have certain rights with respect to the collection, use, transfer, and processing of your “Personal Information”, as defined by the California Consumer Privacy Act (CCPA). We reserve the right to limit these rights where permitted under applicable law, including where your identity cannot be reasonably verified or to the extent your rights adversely affect the rights and freedoms of others. To exercise any of the rights below, please contact us via the contact information below. Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information.

Collection of Personal Information

When California Consumers access the Pilot websites, purchase Pilot products, contact Pilot, seek employment with Pilot, or become a Pilot employee, we collect the following Personal Information.

Identifiers
- Real Name
- Alias
- Post Address
- Email Address
- Phone Number
- Signature
- Account Name
- Unique Personal Identifier
- Online Identifier

Commercial Information
-
• Products or service purchased, obtained or considered

Internet or Electronic Network Activity Information

• Browsing history
• Search history
• Information regarding a consumer’s interaction with an Internet Web site, application, or advertisement
• Internet Protocol address
• Device ID
• Cookies
• Unique Personal Identifier
• Online Identifier
• Beacons
• Pixel Tags
• Mobile Ad Identifiers

Geolocation Data

• Location information
• Device location information

The foregoing pieces of Personal Information have been collected about our consumers in the past 12 months:

Sources from which Personal Information is Collected

• We collect your identifiers from you directly.
• We collect your commercial information by keeping a log of your transactions.
• We collect your internet or other electronic network activity information and geolocation information from your interactions with our website.

Business or Commercial Purposes for which Personal Information is Collected

Your Personal Information is used for the following purposes:

• Communicate: We use Personal Information to communicate with you about our Site or Services. We may also use your Personal Information to send you account
updates or other communications regarding your account or to inform you of any changes to our Site or Services.

- **Specific Purposes:** You may be asked to provide information for a specific purpose. For example, if you would like to use Quick Track to track a shipment or if you need to file a claim of shipment loss or damage, you will be asked for certain information. We will only use the information that you provide for the purpose for which you provided it to us.

- **Customer Support:** We may use your Personal Information to provide you support or other services you request. For example, we may need your information in order to provide technical support or answer questions about our Site or Services.

- **Site Maintenance:** We analyze how our users interact with our Site in order to maintain and improve our Site. We also use information that we collect to diagnose any problems with our Site.

We reserve the right to share information, including Personal Information, with third parties, as described below:

- **Service Providers:** We may share information with service providers that help us perform Site functions and process your transactions. For example, we share information with our EDI providers.

- **Affiliates and Franchises:** We may share information with a parent company, franchisees, subsidiaries, joint ventures, or other companies under common control with us.

- **To Prevent Harm:** We may share information if we believe it is necessary in order to detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights, property, or personal safety of any person.

- **Security Reasons:** Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity; and

**Third Parties with whom Personal Information is Shared**

Pilot shares your Personal Information with affiliates, analytics providers, service providers, benefits providers, transactions processors, IT vendors, and law enforcement (if necessary).

**In the preceding 12 months, we have not sold Personal Information about consumers.**

**In the preceding 12 months, we have not sold Personal Information about minors.**
In the preceding 12 months, we have disclosed the following Personal Information about consumers for business purposes:

1. Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
   
   a. Internet or other electronic network activity information

2. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
   
   a. Identifiers
   
   b. Commercial Information
   
   c. Geolocation Data

3. Debugging to identify and repair errors that impair existing intended functionality.
   
   a. Identifiers
   
   b. Commercial Information
   
   c. Internet or other electronic network activity information

4. Short-term, transient use, provided the personal information that is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter an individual consumer’s experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction.
   
   a. Identifiers
   
   b. Internet or other electronic network activity information

5. Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.
Individual Rights

Right to Know About Personal Information Collected, Disclosed, or Sold

You have the right to request that Pilot disclose the Personal Information it collects, uses, and discloses about you to third parties. There are two types of Right to Know requests you can make:

1. Right to Know (Abbreviated Request): If you make a Right to Know (Abbreviated Request), you will receive the following information about you:
   a. Categories of Personal Information collected;
   b. Categories of sources from which Personal Information collected;
   c. Business purpose for collecting or selling; and
   d. Categories of third parties with whom sold.

2. Right to Know (Specific Pieces of Information Request): If you make a Right to Know (Specific Pieces of Information Request), you will receive the following information about you:
   a. Specific pieces of Personal Information collected about you.

Pilot does not sell any Personal Information of California consumers. This information will be provided to you free of charge, unless Pilot determines that your request is manifestly unfounded or excessive. You may request this information twice in a 12-month period.

Right of Deletion

You have the right to request that Pilot and our service providers delete any Personal Information about yourself that Pilot has collected from you upon receipt of a verifiable request. This right is subject to exceptions.
Submitting Requests

You can submit your request by calling us at +1 (610) 891-8100 and asking for the Data Privacy Officer. You may also submit a request using a webform we make available via email at dataprivacy@pilotdelivers.com

Verifying Requests

Pilot provides California Consumers with the ability to submit requests through our request website, our telephone number, and our email address. Pilot must verify that the person requesting information or deletion is the California Consumer about whom the request relates in order to process the request. To verify a California Consumer’s identity, we may request up to up to three pieces of Personal Information about you when you make a request to compare against our records. We cannot respond to your request or provide you with Personal Information if we cannot verify your identity. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in your request to verify your identity and will delete any information you provide after processing the request. Pilot reserves the right to take additional steps as necessary to verify the identity of California Consumers where we have reason to believe a request is fraudulent.

Authorized Agent

You may choose a person registered with the California Secretary of State that you authorize to act on your behalf to submit your requests (“Authorized Agent”). If you choose to use an Authorized Agent, Pilot requires that you provide the Authorized Agent with written permission to allow them to submit your request and that you verify your identity directly with Pilot. Failure to do so may result in Pilot denying your request.

Right to Equal Service

Pilot will not discriminate against you because you exercised any of your rights, including, but not limited to, by:

- Denying goods or services to you.
- Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties.
- Providing a different level or quality of goods or services to you.
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Updates to this Policy

We reserve the right to modify this Policy at any time, so please review frequently. If we decide to make material changes to this Policy, we will post those changes to this Site in a manner that
we deem is appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we share it. Any modifications to this Policy will go into immediate effect after they have been posted. You agree to these future updates by continuing to use our Site or our Services after they have been posted.

Contact Us

Pilot Freight Services
Legal Department
2 Braxton Way
Suite 400
Glen Mills, PA 19342
USA
Attn: Global Privacy Officer
By Email: dataprivacy@pilotdelivers.com