

SEKO Logistics **Client Privacy Policy**

Your privacy and the safekeeping of the information provided to us, is important. SEKO Logistics and its affiliates and subsidiaries (“SEKO”) conducts its business ethically and in compliance with all laws in countries where SEKO does business. SEKO is firmly committed to being transparent about how it collects and uses any of your personal data. This Client Privacy Policy is subject to all applicable international laws where SEKO does business, including but not limited to those in the U.S., federal and state requirements, including the California Consumer Privacy Act of 2018 (“CCPA”), and the EU General Data Protection Regulation 2016/679 (“GDPR”) (collectively, the “Laws”).

About Us: SEKO is an award-winning business that offers complete supply chain solutions for a global client base. We specialize in transportation, logistics, air and ocean forwarding, warehousing, storage and fulfillment services for a variety of clients spanning various industries, all supported by our in-house developed MySEKO technology. We are headquartered in the United States and have 120 locations spanning 40 countries. This worldwide scope enables customers to benefit from global implementation experience and expertise across all industry sectors, coupled with vital in-country knowledge and service at the local level. As a player in a global market, we take compliance seriously and that includes making sure that we adhere to best practices in privacy, and in the safeguarding of your information!

Our Client Privacy Policy: This Client Privacy Policy: 1) applies to all public and non-public, online and offline, collected, stored, processed, transferred and disclosed personal data of SEKO’s clients (existing, prospective and past), service providers, agents, contractors, visitors to our offices and warehouses, visitors to our websites, software and application users and others who share their personal data with SEKO; and 2) describes what types of personal data we collect, how we use the information, whom we share it with, and the choices you can make about SEKO’s use of your information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices. Our privacy practices may vary among the countries in which we operate to reflect local practices and legal requirements. We reserve the right to change this Privacy Policy at any time, and will indicate the date the Privacy Policy was most recently updated.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Policy.

Cyber Security Protection: SEKO abides by internal strict guidelines and procedures pertaining to Cyber Security. Security Measures such as URL PROTECTION, ATTACHMENT PROTECTION, INTRUSION PREVENTION PROGRAM, SECURE MESSAGING OPTIONS FOR SENSITIVE EMAIL and UNIFIED SECURITY MANAGEMENT help aid in our efforts to secure your data. If you have further questions on our Cyber Security procedures, please reach out to the Data Controller.

What Information We Collect From You: You may provide Personal Data such as your name, address, email, phone, IP address, or geographic location and other personally identifiable and non-public information. You may provide Personal Information such as your name, address, email, phone, IP address, or geographic location and other personally identifiable public and non-public

information (“Personal Information”). Note that in general, we will use the Personal Information we collect from you only for the purposes described in this Privacy Policy or for purposes that we explain to you at the time we collect your Personal Information. However, we may also use your Personal Information for other purposes that are not incompatible with the purposes we have disclosed to you if and where this is permitted by applicable data protection laws.

During the course of our relationship with you we may collect other information than that detailed in this Privacy Policy. If we ask you to provide information voluntarily then the Personal Information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information. If we obtain the information from other sources, then we will only do so where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

Information you may provide voluntarily.

Some Personal Information we collect only when you provide it to us voluntarily. For example, we may have a direct relationship with you, and you may choose to provide information to us in connection with that relationship. You may choose to submit information to us, for example, in person, over the phone, through the postal mail service or electronic mail, on our website, in connection with use of our products, services or applications software, when you participate in an offer or promotion, or in connection with an actual or potential business or employment relationship with us. This Personal Information *may* include but is not limited to:

- Individual and business contact information (such as name, job title, department, company name, postal or e-mail address, and telephone or fax number).
- Shipment information (such as contact information of shipper, consignee and/or notify party, signature on delivery order, description of goods, number of pieces, weight and value of shipment) that is provided to authorities for customs and tax clearance or for security screening.
- Financial information (such as financial account information used for credit set-up and/or information that may be contained in a business credit report such as by Dun & Bradstreet).
- CCTV image, photo, and biometric data such as hand-scans, or even your signature.
- Calls with customer service and other SEKO departments may be recorded to gather information to improve our customer service. However, if you would prefer that your call was not recorded, you can opt out by stating this, or by hanging up.
- If a Client has entered into an agreement with SEKO, we will collect and maintain information about that agreement, including your organizations’ payment information and information about its transactions. We also collect information to enable us to manage and deliver our services and support.

Information that we may collect automatically.

- Some personal data we collect automatically when you use our website, applications software (App), or services. For more detailed information of the types and categories of information that we have collected from clients using our website, please refer to the SEKO Website Privacy & Terms of Use Policy. This is known as user-generated content and in some countries, including countries in the European Economic Area, this information may be considered Personal Information under applicable data protection laws and may include some or all of the following types of information:
 - Your Internet Protocol (IP) address

- Identity of your Internet service provider
- Associated device type
- Name and version of your operating system
- Name and version of your Internet browser
- Date and time of visit
- Cookie identifier (see SEKO's Cookie Statement which can be found on our website at www.sekologistics.com)
- Country of origin information (from which country you are accessing our website)
- Mobile device unique identifier (when accessing web browsers)
- SMS Text
- Social Media identifier when using SEKO's social media platforms (such as Facebook or Twitter ID)
- Geographic location based on GPS/Wi-Fi/communications network local information
- We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked, when those pages were accessed, how long they were viewed.
- Some of this information may be collected using cookies and similar tracking technology, as explained further in our Cookies Policy.

Information We May Obtain From Third Parties.

From time to time, we may receive Personal Information about you from third party sources that use our products or services, publicly available information systems (including third party websites or credit reference agencies) and commercial information services, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

Visitors to Our Facilities.

When you visit one of our offices, you will be asked to provide your name and company to us and present a photo ID. We collect this information for our legitimate business interests, including administrative, notification and housekeeping purposes.

Information From Publicly Available Sources.

In certain instances, SEKO carries out research for our legitimate business interests, more specifically to improve our business, services and technology. In order to do this, we sometimes use publicly available research material. If you are the author of this material then we may collect and process information about you related to your research material such as your name, title, organization and relevant qualifications.

Why We Collect Your Data: Collecting the information described in this Policy enables SEKO to better understand the visitors who come to our Websites, where they come from, and what content on our Websites is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Websites to our visitors. If you are a website user, we collect and use your Personal Information to better understand what content on our websites is of interest to you.

If you are a client, service provider, agent or contractor, we may collect and use your Personal Data to provide the products and services you request; to improve our products and services; send notifications; and protect against, identify and prevent fraud and other criminal activities, claims and other liabilities among others.



If you are a client, service provider, agent or contractor, we may collect, process, and/or otherwise use your Personal Data for the following purposes (including but not limited to):

- For the purpose of general business relationship management within SEKO
- Provide the information, products and services you request
- Create, view and track shipments
- Provide you with shipment information such as tracking and tracing of shipment location
- Bill you for the products and services you request
- Provide you, if you are a client, with effective customer service
- Contact you with information and notices related to your use of our products and services, including our website
- Contact you with special offers and other information we believe will be of interest to you (in accordance with any privacy preferences you have expressed to us)
- Vet you, if you are a service provider, agent or contractor, to ensure that you (and your company) have the appropriate experience and qualifications to provide services on our behalf
- Invite you to participate in surveys and provide feedback to us (in accordance with any privacy preferences you have expressed to us)
- Improve our products and services and develop new products and services
- Improve our marketing and promotional efforts
- Improve the content, functionality and usability of our website
- Enforce our website's Terms of Use including your privacy rights contained therein, which can be found at www.sekologistics.com
- Use for any other purpose about which we provide notice at the time of collection
- Comply with legal and regulatory requirements; monitoring and enforcing compliance with company policies and procedures and with legal and regulatory requirements
- Protect the security of Personal Data as well as SEKO systems and premises
- Protect against, identify and prevent fraud and other criminal activity, claims and other liabilities

If you are a website or application user, we may collect, process, or otherwise use your Personal Information for the following purposes, including but not limited to:

- Understanding what content is of interest to you
- For our internal analytics purposes
- To improve the quality and relevance of our websites to our visitors
- To improve the quality of our applications.

Data Transfers: We do not sell, disclose, or otherwise process your Personal Data except as described herein or otherwise disclosed to you at the time the data is collected. We will retain your Personal Data no longer than is necessary to carry out the purposes listed in this Privacy Policy and/or as required by applicable law.

SEKO may at times share information with third parties in situations where we believe, in good faith, that the law requires us to do so. Such instances that third parties would be involved would be exclusively to the required extent in order to perform the services that you have requested or authorized and to protect your and our rights, property or security, if we are obligated to do so based on applicable laws, orders by courts or other government regulations. SEKO understands

that our agents, clients and other affiliate companies to whom we pass on your Personal Data, might possibly be domiciled outside of your home country, and potentially also in countries with data protection laws that can differ from those applicable in the country where you are domiciled. In such cases, SEKO will ensure and take measurable steps to protect your Personal Data by introducing suitable legal mechanism, e.g. SEKO Logistics Data Processing Agreement which contains contractual protections for the transfer of personal information among various jurisdictions (including, e.g., the European Commission’s Standard Contractual Clauses).

You can be assured that we protect the information we collect. By using our products and or services and by accessing our website, you agree to the collection, use and sharing of your Personal Data and information in accordance with this Privacy Policy.

What Rights Do You Have Over Your Information? You can request a confirmation from the Data Controller of whether Personal Data is being processed by us. You may ask us how we process your data, correct or delete your Personal Data, request to limit the processing of Personal Data, to request a receipt of personal information relating to you that you have made available to the Data Controller and you have the right to revoke your consent at which time the legitimacy of the processing that has taken place up until your objection will not be affected by the revocation of the consent. Where the applicable Laws require it, you may also have the right to request and obtain a complete copy of all information stored about you.

If you are a resident of California or the European Economic Area you have the following additional data protection rights:

- You can request a confirmation from the Data Controller of whether Personal Information is being processed by us.
- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided below, which you can see by clicking the following link: [How to Contact Us](#). If applicable, you may also be able to access and update certain information via your online account.
- You can object to processing of your Personal Information, ask us to restrict processing of your Personal Information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided below, which you can see by clicking the following link: [How to Contact Us](#).
- You have the right to opt-out of any marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided below, which you can see by clicking the following link: [How to Contact Us](#).
- Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

- SEKO shall not discriminate against a consumer for exercising their rights under the CCPA or any other applicable data privacy regulation.
- Where the applicable Laws require it, you may also have the right to request and obtain a complete copy of all information stored about you.
- To the extent a company sells your Personal Information (which SEKO does not), if you are a California consumer, you may opt out of SEKO selling your personal Information by clicking a link titled “Do Not Sell My Personal Information” which link will be located on SEKO’s homepage.
- You may request erasure of your Personal Information in accordance with our Data Erasure Policy by contacting us via email or phone, or by submitting an online request.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Who Might SEKO Share My Information With? We may disclose your personal information to the following categories of recipients:

- to our affiliates, as well as to a limited number of third-party business partners, service providers, vendors, suppliers and other contractors (collectively, “Service Providers”) for the purpose of assisting us in providing, managing, deploying, enhancing, or improving our services. SEKO maintains contracts with these SEKO affiliates and Service Providers restricting their access, use and disclosure of Personal Information in compliance with our Privacy Policy obligations. We also may share or disclose Personal Information to the extent that the customer or other data controller has obtained the relevant individual’s consent.
- to our affiliates, third party services providers and partners who provide data processing services to us, for example (i) to support the delivery or pick up of shipment, or (ii) to support the delivery of, provide functionality on, or help to enhance the security of our websites, applications or services, (iii) for quality control and assurance, or (iv) improving our services and developing new services. We may also share personal information with such third parties where we consider that such disclosure is necessary to protect the safety or legitimate business interests of those third parties, including to investigate suspected fraud or to trace debtors.
- to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to an actual or potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy;
- to any other person with your consent to the disclosure.

Sale of Personal Information: Other than the uses provided for herein, **SEKO does not sell your Personal Information to any third parties.** In the unlikely future event that SEKO does sell your Personal Information to a third party, SEKO’s website will be updated to include a link titled “Do Not Sell My Personal Information” which you may follow to opt out of such sale of your Personal Information. Such link will be located on our homepage and on each page in which Personal Information is requested.

How Safe Is My Information? SEKO has in place industry-accepted physical, technical and administrative security measures appropriate and applicable to our business to safeguard and secure the Personal Data we collect from you. The measures we use are designed to provide a level of security appropriate to the risk of processing your Personal Information. Specific measures we use may include SSL encryption technology for protection of sensitive information such as payments when in transit. We have industry-standard administrative, technical and physical safeguards in place to protect the confidentiality, integrity and availability of your personal information.

You have the right to expect us to protect your Personal Data and keep it safe. We work hard to protect SEKO, our clients, partners, customers, shippers, vendors and users from unauthorized access to or unauthorized alteration, disclosure or destruction of the information we hold. In particular: we stand by this Privacy Policy at all times with respect to all Personal Data that we collect from you by limiting the use and disclosure of your Personal Data, and work to ensure that anyone with whom we share such information treats that information with the privacy and security it deserves.

How Can I Contact You?

The Data Controller in the definition of the EU General Data Protection Regulation and other, national data protection laws of the Member States as well as further data protection regulations is:

Data Controller:
Chief Technology Officer
1100 Arlington Heights Road, Suite 600
Itasca, IL 60143
USA
#630-919-4800
dataprivacy@sekologistics.com

Data Protection Officer:
General Counsel, Vice President
SEKO Logistics
1100 Arlington Heights Road, Suite 600
Itasca, IL 60143
USA
#630-919-4800
dataprivacy@sekologistics.com

Toll-Free Telephone:
English speaking USA and Canada: (844) 510-0059

To request **Erasure/Deletion of Personal Information**, please click on the following link and complete and submit [SEKO's Data Erasure/Deletion Request Form](#).

Last Updated: January 07, 2020