

PRIVACY POLICY

CtrlChain respects privacy and is committed to protecting personal information.

This Privacy Policy (the “Policy”) explains our practices for handling the information we may receive about visitors to our website, users of our application and services, customers, business partners, and others with whom we interact in providing our services.

This Policy applies to information you provide to us through our website, ctrlchain.com, and application (collectively, the “Site”), when you communicate with us, and through our other interactions with you. It describes the types of personal information we may receive, how we may use and disclose the information, and certain rights and options you may have regarding your information. Use of our Site is also subject to our Terms and Conditions, which are available [here](#).

important information about this policy

While we always aim to provide complete and transparent information about how we process your personal information, we reserve the right to amend or update this Policy from time to time or to create additional policies in order to accurately reflect changed circumstances or new legal requirements. As a result, it is important that you read this Policy closely so that you are fully aware of how and why we are using your personal information.

To assist us in ensuring that we can provide the most accurate information possible, we ask that you check this Policy for updates. We also ask that where we have an ongoing relationship with you and any of the data you have provided becomes no longer accurate that you keep us informed of this so we can amend our records accordingly. By providing us with personal information or using our website, you expressly consent to the information-handling practices described in this Policy. If you do not agree with this Policy, please do not use our website or provide us with your information.

INFORMATION WE RECEIVE

A. Personal Information

For the purposes of this Policy, “personal information” is any information that identifies, relates to, or can be used to contact a particular individual. The types of personal information we receive includes the following categories.

Contact information

First name, last name, email address, position, physical address of your organization, billing address, and telephone number.

Customer account information

Customer ID, account username, account password, account number, and other information that we may request or that you may provide relating to your account.

Transactional information

Details about your organization’s transactions with us, including method of payment, payments received, payment details, transaction history, and other information

relating to the services purchased by your organization.

Payment information

Details of the payment card or financial account you use to pay for our services or for transactions with CtrlChain.

Marketing information

Details regarding informational and promotional materials you may have requested or received from us, the services in which you are interested, your receipt of promotional communications, and information on your marketing or communication preferences.

Communication information

Copies of communications and inquiries you have submitted to us, including through email, calls, and chatbots or other features available on our Site.

Device and usage information

Details regarding how and when you use our Site, including the device used to connect to our Site or software, your IP address and device identifier, the frequency and duration of

your usage, the pages you view, what websites or search terms referred you to our website, and information about your interaction with our Site.

Location information

In connection with our services, we may receive certain location information in order to identify carriers for specific shipments.

We collect this information when you visit or navigate our Site, fill in forms on our Site, sign up for our service or use our application, engage in transactions with us, communicate with us (including by phone, email, or otherwise), visit or engage with our social media pages, or otherwise provide us with personal information.

Please note that we may aggregate or anonymize the foregoing types of information such that they are no longer capable of identifying you, in which case they are not considered "personal information." We may also collect information about you from third-party sources and information about you that is publicly available.

B. Automatically Collected Usage and Device Information

Like most websites, our Site uses various technologies to automatically collect information about visitors. Those technologies include:

Cookies

Cookies are small text files that a website transfers to a visitor's device for recordkeeping purposes. We use cookies to personalize visitors' experiences on our website, provide content that we believe may be of interest, track visitor trends and patterns, engage in marketing and advertising, and otherwise analyze our Site traffic. For further information about cookies, including how to refuse cookies, please visit www.allaboutcookies.org. Please note that if cookies are disabled, you may not be able to enjoy certain features of our Site.

Log Files and Device Identifiers

We use log files to track actions occurring on the Site and collect data about visitors, including IP address, browser type, Internet

service provider, referring/exit pages, date/time stamps, and device identifiers.

Web beacons and other technologies

Our Site may use other tracking tools, including web beacons (also known as clear gifs, pixel tags, and single-pixel gifs), which are small electronic images embedded in content and email messages that are not ordinarily visible to users. Web beacons allow us to track pages and content accessed and viewed by users, as well as to monitor email readership.

Analytics

Our Site may also use third-party analytics tools such as Google Analytics. You can find more information about how data is collected and processed in connection with the Google Analytics service [here](#). You can also read Google's privacy policy [here](#).

The information collected through these technologies may be combined with personal information or aggregated with other information on Site visits. We may share information about your use of our Site with our advertising and analytics partners, who may combine it with other information that you previously provided to them. You can read more about the cookies and other technologies we use on our website in our [Cookie Statement](#).

C. Information from Social Media

If you interact with us on any social media platform: (i) depending on your social media privacy settings, the personal information that you submit on the social media platform may be read, collected, or used by us as described in this Policy, and (ii) where we respond to any interaction with you on social media, your account name/handle may be viewable by any and all members or users of our social media accounts. Social media platforms operate independently from CtrlChain and we are not responsible for the personal information that you choose to submit or link on any social media platform. We encourage you to review the privacy policies and settings of any social media platform with which you interact to help you understand their privacy practices.

D. Information from Other Sources

We may obtain both personal and non-personal information about you from business partners, contractors, suppliers, and other third parties and add it to other information we have collected. We, and the third parties we engage, may combine information we collect from you over time, and across the Site, with information obtained from other sources. This helps us improve the information's overall accuracy and completeness, and also helps us better tailor our interactions with you.

How We Use Personal Information

We (or service providers acting on our behalf) may use the personal information identified above for the following purposes:

- Negotiating, entering into, and managing our business relationship and agreements with your company, including providing our services and processing payments from your company.
- Providing and optimizing your experience on our Site (including our application) and ensuring that we present our content to you in the most effective manner.
- Communicating with you and responding to your inquiries and communicating regarding our services, our agreements with your company, and other issues.
- Managing customer service issues, including issues relating to the performance of our services and customer feedback.
- Selecting the correct carrier to you for specific transport needs and providing "track and trace" functionality for active orders.
- Enforcing our agreements with customers, complying with our legal or regulatory obligations, and defending or advancing legal claims.
- Providing you with surveys or otherwise soliciting feedback from you.
- Sending you promotional or informational communications and solicitations, tracking your marketing preferences, and for our internal marketing purposes.
- Developing, updating, and improving our services, customer service, and customer experience, and otherwise improving our knowledge and insights regarding customers.
- Preventing and detecting fraud, financial crime, hacking activities, security breaches, and other unlawful activities in connection with the Site or the purchase or use of our services.
- Notifying you about changes to our Site, services, or material changes to this Policy.
- Performing other functions as otherwise described to you at the time of collection or to which you otherwise consent.

For more information about your options relating to your personal information and your communication preferences, see "Choices About the Collection and Use of Personal Information" below.

Our Marketing Efforts

We may send you direct marketing communications from time to time including news, updates, offers, and other promotions relating to our services and activities. We will only send marketing messages where the law allows us to do so and, in the event that you no longer wish to receive marketing from

us, then you can always unsubscribe using the option provided in the footer of the communication you have received or by contacting us using the information below.

Disclosure of Personal Information

When the information we collect about you is aggregated, anonymized, or otherwise does not identify you, we may use that information for any purpose or share it with third parties, to the extent permitted by applicable law.

In addition, we may share your information with the following types of entities:

- Business partners, service providers, and third-party vendors necessary for the performance of any contract we enter into with you. For example, we may disclose your information to our carriers assisting with a specific shipment, shipping logistics planners, insurance providers, and legal counsel in the event of a dispute.
- Marketing and advertising vendors that may assist with lead generation, hosting information relating to clients and potential clients, marketing automation, advertisement placement and targeting, and marketing campaigns and communications.
- Regulatory and governmental authorities, law enforcement agencies, and courts, as necessary to comply with applicable laws and regulations, respond to a subpoena, search warrant, or other lawful request for information, or to otherwise protect our rights.
- Service providers we use to facilitate our business operations and administration. These third parties have access to your personal information only to perform specific tasks on our behalf and are obligated not to disclose or use it for any other purpose. For example, our service providers include (i) IT and system administration providers, (ii) data storage providers, and (iii) vendors to facilitate payments and payment processing.
- Analytics vendors in order to understand our Site traffic and usage patterns, optimize our Site, and identify potential new customers.
- Buyers or other successors prior to or in the event of a merger, acquisition, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as a part of bankruptcy, liquidation, or similar proceeding, where the information is among the assets transferred.
- Other parties for any purpose we disclose at the time you provide the information.

Your Choices About Personal Information

We respect your right to make choices about the ways we collect, use, and disclose your information. We try to offer you meaningful choices regarding your personal information. Some choices you have regarding personal information include the following.

Marketing Emails

As required by applicable laws, you can opt-out of receiving promotional emails from us by clicking the “opt out” link in any such promotional emails and following the instructions provided.

- **Cookies**

Depending on your browser or device, you may have the option to set the browser to accept all cookies, reject all cookies, notify you when a cookie is set, or delete cookies. Each browser and device are different, so we recommend you evaluate the tools and settings available in your browser or device, as well as any available instructions for the same. We provide information on disabling cookies in our Cookie Statement.

- **Google Analytics**

As discussed above, we use Google Analytics in connection with the Site. If you would like to refrain from having your data collected by Google Analytics, Google has developed an opt-out browser that you can use. You can find more information on how Google uses information it collects [here](#).

- **Declining to Provide Information**

You can choose not to provide us with information we may request through our Site, but that may result in you being unable to use certain features of our Site, request information about our services, or initiate other transactions with us.

- **Do Not Track Mechanisms**

Please note that our Site does not honor “Do Not Track” signals, and such signals will not impact the operation of this Site.

In addition to the above, you may contact us using the details provided at the end of this policy with any questions about the choices relating to your personal information.

Links to Third-Party Websites

Our Site may contain links to third-party websites. Such websites have separate privacy policies that you should review. We do not control these third-party websites and are not responsible for the content of linked websites or those companies’ data-handling practices.

Shine the Light Act

California Civil Code § 1798.83 (California’s Shine the Light Act) 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 at the contact information below.

Children’s Privacy

Our Site is a general audience site and is not directed at, or intended for use by, children under the age of 16 years. Accordingly, we do not knowingly collect personal information from children under age 16. Should we discover that a child under the appropriate age provided his or her personal information, we will use that information only to respond to that child and inform him or her that we must have parental consent before receiving such information.

Security of Personal Information

We use appropriate administrative, technical, and physical measures to protect your personal information from loss, theft, and unauthorized use, disclosure, or modification. Please be aware that no data transmission over the Internet is 100% secure. While we strive to protect your personal information, we cannot ensure or warranty the security of any information you transmit to us, and you do so at your own risk.

Data Storage and Retention

We will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or other mandatory reporting requirements. To determine the appropriate retention period we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process it, whether we can achieve those purposes through other means, and the applicable legal requirements. We also consider any specific limitation periods under applicable law.

Changes to this Policy

Please note that we may change this Policy from time to time. If there are changes to our Policy, we will post them here and update the "Last Updated" date at the top of this document. Continued use of this Site after any changes is deemed to be acceptance of those changes. Accordingly, we encourage you to check the Policy periodically for updates.

How to Contact Us

For questions or more information about our privacy practices, please contact us by e-mail at marketing@ctrlchain.com or by using the contact information provided below:

CtrlChain

500 W. Madison St. STE 3105 Chicago, IL, 60661
+1 312 646 3814
marketing@ctrlchain.com