



PRIVACY NOTICE

Last updated on January 13, 2023

This **Privacy Notice** explains how Interpool, Inc., d/b/a TRAC Intermodal® and its subsidiaries (collectively, "**TRAC**", "**we**", "**us**", "**our**") collect, use, and share your personal information, and what choices you have to manage how we handle your personal information.

Effective January 13, 2023, we have updated our Privacy Notice. This Privacy Notice has been changed in the following ways:

- We have added the ways in which we collect your personal information;
- We have added the ways in which your personal information is sold or shared;
- We have included consumer rights you may be entitled to under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (as so amended, the "CCPA");
- We have added additional ways in which you can exercise your consumer rights; and
- We have added the period for which the personal information of California residents will be retained.

(1) APPLICABILITY OF PRIVACY NOTICE

This Privacy Notice applies to your use of or access to the websites, portals and mobile applications operated by TRAC (each, a "**Website**" and, collectively, the "**Websites**") and other channels of communication with us.

(2) COLLECTION OF YOUR PERSONAL INFORMATION

We collect personal information, which is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you. We collect personal information directly from you and automatically when you use the Websites. We do not use or disclose sensitive personal information for any purpose other than in connection with providing our products and services, including processing your payment, verifying your identity, and to detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted personal information.

(A) Information You Provide To Us.

We collect personal information directly from you when you:

- **Contact us.** When you send us a question or inquiry, or ask for other support, you will need to provide us with personal *identifiers* (name, telephone number, and email address). We use this personal information to respond to your questions or inquiries, troubleshoot where necessary, and address any issues you have with the Websites or requested products or services. We may use this information to send you marketing and promotional e-mails. You may opt-out of receiving marketing emails from us by clicking the “unsubscribe” link provided with each email or by calling 877-987-2226, option 2. Please note that we will continue to send you notifications necessary to the Websites or requested products or services. Our communications contain tracking technologies, provided by Hubspot, to gain valuable insight into behavior of recipients. With the help of these technologies, we can analyze whether a predefined action took place by a recipient, such as opening our communications, in order to better adapt and distribute our communications. When you opt-in to our marketing communications, you are opting into the use of these technologies. You can disable tracking by disabling the display of images by default in your email program.

If you are a California resident, we will retain the information described in this section for as long as we have an ongoing relationship with you and thereafter for a period of up to three years or for as long as we are required under applicable law.

- **Request content from our website.** When you request content from any of our Websites, such as an e-book, we collect your *identifiers* (name, phone number, company name, and email). We use this information to add you to our marketing database and send you marketing communications based on this information. If you are a California resident, we will retain this information for as long as we have an ongoing relationship with you and thereafter for a period of up to three years or for as long as we are required under applicable law. You may opt out of receiving marketing communications at any time by clicking the “unsubscribe” link in each email or by calling 877-987-2226, option 2.
- **Make a payment.** TRAC permits online bill payments through a third-party payment provider. When you pay your bill online, we collect your personal *identifiers* (name, email address, and telephone number) and *financial account information* (routing number, account number, and check number, or payment card number, expiration date, and CVV). We only use this personal information to process your payment. If you are a California resident, we will retain this information for as long as we have an ongoing relationship with you and thereafter for a period of up to three years or for as long as we are required under applicable law.
- **Rent or lease a chassis.** If you request to rent or lease a chassis on any of our Websites, we will collect your personal *identifiers* (name, email address, and telephone number) and company name. If you decide to set up an online account to rent or lease a chassis, we will also collect additional identifiers (title, user ID, password and answers to selected security questions). We use this personal information to manage your request and to communicate with you about your request. You will receive email reminders to register on the TRAC Connect platform. You may opt out of receiving marketing communications at any time by clicking the “unsubscribe” link in each email or by calling 877-987-2226, option 2. Please note

that we will continue to send you notifications necessary to the Websites or the requested products or services. Upon the request of certain customers, we may also collect, through a third-party tracing provider, your geolocation data as you use the chassis. We provide this information to the requesting customer and will use this information to protect our legal rights and property.

If you are a California resident, we will retain the information described in this section for as long as we have an ongoing relationship with you and thereafter for a period of up to three years or for as long as we are required under applicable law.

- **Apply for employment with us.** When you apply for employment with TRAC, we will collect, through our third-party service provider, your personal identifiers (name, email address, physical address, telephone number) and your professional or employment information (resume, cover letter, employment history, educational history). We use this personal information to assess and manage your application with TRAC, to communicate with you, and as necessary to comply with the law. If you are a California resident, we will retain this information for as long as we are considering you for employment (or, if you become an employee of TRAC, for the duration of your employment with us) and thereafter for a period of up to three years or for as long as we are required under applicable law.
- **Login to your billing management account.** When you login to your user account, we will collect your identifiers (username and password). We will use this information to authenticate you to your account, and provide access to your account. If you are a California resident, we will retain this information for as long as we have an ongoing relationship with you and thereafter for a period of up to three years or for as long as we are required under applicable law.
- **Access EZBook Chassis reservation system.** When you request access to the EZBook Chassis reservation system we will collect your identifiers (user ID, password, name, email address, and phone number). We will also verify the reCAPTCHA, the data collection and use of which is governed by its independent [Privacy Policy](#) and [Terms of Use](#). We will use this information to set up your account, provide you with access to the chassis reservation system and process your requests through this system. If you are a California resident, we will retain this information for as long as we have an ongoing relationship with you and thereafter for a period of up to three years or for as long as we are required under applicable law.

TRAC may also use the personal information we collect as described in this section to comply with the law, to efficiently maintain our business, and for other limited circumstances as described in **HOW WE SHARE YOUR PERSONAL INFORMATION**.

(B) Information Collected Automatically.

In addition to the personal information you provide directly to us, we also collect information from you automatically as you use our Websites via cookies and SDKs. This includes the following internet or other electronic network activity information:

- **Usage information:** We use strictly necessary and functional cookies to collect information about your interaction with our Websites, such as the pages you visit, the frequency of access, how much time you spend on each page, what you click on, and referring website address. We use this personal information to: (i) enhance user experience; (ii) prevent fraudulent use of the Websites and our services; and (iii) diagnose and repair errors. Third party marketing and analytics cookies may be considered sharing under the CCPA. More information on these cookies, including a list of third-party marketing and analytics cookies and options with respect to opting out of the sale of your personal data, can be found below.
- **Device information:** We use strictly necessary and functional cookies to collect certain information about the device you use to access our Websites, such as browser type, browser language, hardware model, operating system, and your preferences. We use this personal information to: (i) enhance user experience; (ii) prevent fraudulent use of the Websites and our services; (iii) diagnose and repair errors; (iv) remember your preferences; and (v) provide enhanced functionality. Third party marketing and analytics cookies may be considered sharing under the CCPA. More information on these cookies, including a list of third-party marketing and analytics cookies and options with respect to opting out of the sale of your personal data, can be found below.
- **Location information:** We use strictly necessary and functional cookies to collect information about your location, which may be determined through your IP address. We use this personal information to: (i) enhance user experience; (ii) prevent fraudulent use of the Websites and our services; (iii) diagnose and repair errors; (iv) remember your preferences; and (v) provide enhanced functionality. Third party marketing and analytics cookies may be considered sharing under the CCPA. More information on these cookies, including a list of third-party marketing and analytics cookies and options with respect to opting out of the sale of your personal data, can be found below.

Particular third-party cookies on our Websites to note include:

- **Google Analytics.** We use Google Analytics to collect information on your use of the Websites to improve our services. In order to collect this information, Google Analytics may set cookies on your browser, or read cookies that are already there. Google Analytics may also receive information about you from applications you have downloaded that partner with Google. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to our Websites or to another application which partners with Google is restricted by the Google Analytics Terms of Use and the Google Privacy Notice available [here](#). To prevent your data from being used by Google Analytics, you can download the Google Analytics opt-out browser add-on for Google Analytics which can be found [here](#). For processing of information of California residents we have enabled the "restricted processing" feature.

- **DoubleClick.** We utilize DoubleClick by Google to serve ads based on a user's prior visit to our Websites. Each visitor to our Websites receives a different cookie and the information collected by the cookie is used to generate conversion statistics and allows us to see the total number of individuals who clicked on our ads. The DoubleClick cookie is used by Google in the ads served on the website and mobile applications of its partners, such as website and mobile applications participating in Google certified ad networks. DoubleClick enables Google and its partners to serve ads to you based on your visit to our Websites and other websites on the Internet. Please review Google's [Privacy Notice](#) at for additional information on how Google uses the information collected. To opt out of targeted advertising by Google and this sharing, you can go to Google's [ad settings](#) or you can install the [DoubleClick opt-out add-on](#). For processing of information of California residents we have enabled the "restricted processing" feature.
- **Hubspot.** We use Hubspot to analyze the data traffic on our Websites and your behavior while using our Websites. We use this information to gain valuable insights into user behavior on our Website to improve our Website. We also use Hubspot to send our emails and to track the behavior of our email recipients. With the help of Hubspot's conversion tracking, we can analyze whether a predefined action took place by an email recipient, such as opening our email, in order to better adapt and distribute our emails. For more information on Hubspot, please review its [Privacy Policy](#). You can control the information provided to Hubspot by following the instructions in **YOUR INFORMATION CHOICES**, or by visiting [Do Not Sell or Share My Personal Information](#). You can disable email tracking by disabling the display of images by default in your email program.
- **LinkedIn.** We use LinkedIn analytics and advertising products, for example, to target advertising based on what is relevant to a user, to improve reporting on campaign performance and to avoid showing ads the user has already seen. LinkedIn will use the information collected in accordance with its User Agreement and Privacy Policy. You can visit LinkedIn Advertising Preferences to choose how data is used here, or by visiting [Do Not Sell or Share My Personal Information](#).
- **Essential SDKs.** Our mobile applications use essential SDKs which are necessary for the mobile applications to function. Without these SDKs, you would not be able to use the application.

In general, to disable cookies and limit the collection and use of information through them, you can set your browser to refuse cookies or indicate when a cookie is being sent. When you opt-out, an opt-out cookie will be placed on your device. The opt-out cookie is browser and device specific and will only last until cookies are cleared from your browser or device.

(3) HOW WE SHARE YOUR PERSONAL INFORMATION

General Sharing

TRAC may need to make the personal information identified in this Privacy Notice available within TRAC, with service providers, or with other third parties. These instances include:

Within TRAC. We may share your personal information with our subsidiaries and affiliates for legitimate business purposes, general business management, and as permitted by law.

With Service Providers. We may share your personal information with our service providers that assist us in providing our services. These service providers include email marketing service providers, digital marketing providers, customer relationship management providers, applicant tracking system provider, and payment processors.

With Third Parties. We may need to disclose your personal information to third parties, such as legal advisors, law enforcement agencies, or governmental/regulatory bodies in order to protect our legal interests and other rights, protect against fraud or other illegal activities, prevent harm, for risk management purposes, and to comply with our legal obligations.

In the Event of a Corporate Reorganization. In the event that we enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganization, merger, acquisition, sale, joint venture, assignment, consolidation, transfer, change of control, or other disposition of all or any portion of our business, assets or stock, we would share personal information with third parties, including the buyer or target (and their agents and advisors) for the purpose of facilitating and completing the transaction. We would also share personal information with third parties if we undergo bankruptcy or liquidation, in the course of such proceedings.

With Your Consent. Apart from the reasons identified above, we may request your permission to share your personal information for a specific purpose. We will notify you and request consent before you provide the Personal Information or before the personal information you have already provided is shared for such purpose. You may revoke your consent at any time.

Sharing in the Last Twelve (12) Months

For a Business Purpose. In the preceding twelve (12) months, TRAC has disclosed the following categories of personal information for a business purpose to the following categories of third parties:

- We have disclosed your personal identifiers, internet and other network activity information, and financial account information to service providers that perform services on our behalf, such as email and digital marketing, payment processing, and customer management.

- We have disclosed your internet or other electronic network information to our IT support to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and to identify and repair errors that impair the functionality of our Websites and other services.
- We have disclosed your internet or other electronic network information and location information to our IT support to maintain, improve, and upgrade our Websites and other services.

Sale or Sharing of your Personal Information. In the preceding twelve (12) months, we have used Hubspot and LinkedIn cookies. These cookies collect your internet and other electronic network activity and share that information with the applicable cookie provider (Hubspot and LinkedIn). This sharing of your personal information may be considered a sale under the California Consumer Privacy Act. To opt out of these cookies, follow the instructions in the **YOUR INFORMATION CHOICES** section or visit [Do Not Sell or Share My Personal Information](#).

(4) YOUR INFORMATION CHOICES

Correct or View Your Information. You may access your TRAC Connect account to correct or view certain personal information you have provided to us in the TRAC Connect account. You may access and correct your information on our other Websites or portals (such as EBS Bill Management, EZBook, Salesforce, Hubspot or Constant Contact) by contacting us directly at customerservice@tracintermodal.com.

Online Advertising. To opt-out of interest based advertising generally or to learn more about the use of this information by our service providers you can visit the [Network Advertising Initiative](#) or the [Digital Advertising Alliance](#).

Double Click. To opt out of targeted advertising by Google, you can go to Google's [ad settings](#). You may also install the [DoubleClick opt-out add-on](#).

Google Analytics. To prevent your data from being used by Google Analytics, you can download the Google Analytics [opt-out browser](#) add-on for Google Analytics.

Cookies. All session cookies are temporary and expire after you close your web browser. Persistent cookies can be removed by following your web browser's directions. To find out how to see what cookies have been set on your computer or device, and how to reject and delete the cookies, please visit: <https://www.aboutcookies.org/>. Please note that each web browser is different. For information on reviewing or deleting cookies from specific browsers, click on the appropriate browser: [Firefox](#), [Firefox IOS](#), [Firefox Android](#), [Safari](#), [Safari Mobile](#), [Chrome](#), [Internet Explorer](#), [Microsoft Edge](#), [Opera](#). To find information relating to other browsers, visit the browser developer's website and mobile application. If you reset your web browser to refuse all cookies or to indicate when a cookie is being sent, some features of our Websites may not function properly. If you choose to opt out, we will place an "opt-out cookie" on your computer. The "opt-

out cookie" is browser specific and device specific and only lasts until cookies are cleared from your browser or device. The opt-out cookie will not work for essential cookies. If the cookie is removed or deleted, if you upgrade your browser or if you visit us from a different computer, you will need to return and update your preferences.

Marketing Emails. You may opt-out of receiving marketing emails from us by clicking the "unsubscribe" link provided with each email or by calling 877-987-2226, option 2. Please note that we will continue to send you notifications necessary to the Websites or the requested products or services.

(5) CALIFORNIA RESIDENTS

The CCPA entitles California residents to certain rights. To the extent the CCPA applies to our processing of your personal information, you are entitled to the following rights:

- **Right to Access/Know.** You have the right to request what personal information we have collected, used, disclosed, and sold about you. You may only submit a request for access twice within a twelve-month period.
- **Right to Deletion.** You have the right to request the deletion of your personal information that we collect or maintain, subject to certain exceptions.
- **Right to Correct.** You have the right to request that we correct inaccurate personal information that we maintain about you.
- **Right to Opt-Out of a Sale or Sharing.** You have the right to opt-out of the sale or sharing of your personal information to third parties. TRAC does not have actual knowledge that it sells personal information of minors under the age of sixteen (16) years.
- **Right to Non-Discrimination.** You have the right to not receive discriminatory treatment if and when you exercise your rights to access, delete, or opt-out under the CCPA.

To exercise your right to access or delete your personal information, you may submit a request by telephone by calling 877-987-2226 option #2 or by sending an email to privacy@tracintermodal.com. To opt out of the sale or sharing of your personal information, please visit [Do Not Sell or Share My Personal Information](#) or utilize the opt out preference signal to instruct TRAC to not sell or share any of your personal information collected online. The opt out preference signal will apply to the device and browser in which you utilize it. You can utilize the opt out preference signal by enabling it through your browser or device settings.

For requests submitted via telephone or email, you must provide us with sufficient information to allow us to reasonably verify you are the person about whom we collected the personal information and describe your request with sufficient detail to allow us to properly evaluate and respond to it. If we are not able to verify your identity for access and deletion requests with the information provided, we may ask you for additional pieces of information. The interactive webform contains the information that we need to verify your identity and review your request.

Only you, or a person that you authorize to act on your behalf, may make a request related to your personal information. If you have authorized an agent to submit a request on your behalf, you must either: (1) verify your identity directly with TRAC, or (2) directly confirm with TRAC that you provided the authorized agent permission to submit the request on your behalf. If you are an authorized agent making a request on behalf of another individual, you must provide us with signed documentation that you are authorized to act on behalf of that individual.

(6) NEVADA RESIDENTS

If you are a consumer in the State of Nevada, you may request to opt-out of the current or future sale of certain of your personal information. We do not currently sell any of your personal information under Nevada law, nor do we plan to do so in the future. If you have any questions regarding our data privacy practices, or would like to opt-out of the future sale of your personal information, please contact us as set forth below:

- 877-987-2226, option #2, or
- privacy@tracintermodal.com

(7) DO NOT TRACK

We do not respond to Do Not Track (“DNT”) requests. Do Not Track is a [preference](#) you can set in your web browser to inform website and mobile applications that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

(8) INFORMATION SECURITY

We implement and maintain reasonable security measures, including encryption, to help protect the personal information we collect and maintain from unauthorized access, destruction, use, modification, or disclosure. However, no security measure or modality of data transmission is 100% secure and we are unable to guarantee the absolute security of the personal information we have collected from you.

(9) CHILDREN’S PRIVACY

None of our products or services (including the Websites) are intended for individuals under the age of eighteen (18) years. If we learn that we have collected or received personal information from a child under the age of eighteen (18), we will delete that information. If you believe we might have information from or about a child under the age of eighteen (18), please contact us at privacy@tracintermodal.com.

(10) CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice is subject to change. Changes to this Privacy Notice will be posted on this page and we will indicate the date the changes go into effect. We encourage you to review this page frequently and review the Privacy Notice for any changes. If we make changes that materially affect your privacy rights, we will notify you through a prominent posting on the applicable Websites.

(11) CONTACT US

If you have any questions or concerns about this Privacy Notice, please contact us at privacy@tracintermodal.com.