

DIGITAL RESOURCE PRIVACY POLICY

Effective as of 1/8/2024

Subcontracting Concepts, LLC's and its affiliated companies ("SCI," "we," "us," or "our", "Company") privacy policy (the "Privacy Policy") applies to the Company's family of Websites and SCI Driver Mobile application (App) (the "Digital Resources"), owned and operated by SCI. We have created this Privacy Policy to tell you what information we collect, how we use that information, and who we will share that information with, if at all. This Privacy Policy does not address the privacy practices of any third parties that we do not own, control, or are affiliated with. By visiting and/or using our Digital Resources, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Use. We encourage you to read the Privacy Policy, and to use the information it contains to help you make informed decisions.

1. Information We Collect or Receive. While operating the Company's Digital Resources, we will collect and/or receive the following information: ("Collectively referred to as Information").

- (a) **Personal Information.** We receive and collect information that identifies you personally if you choose to provide such personally identifiable information. Such Personal Information may include your name, date of birth, social security number, Employer Identification Number, bank account, and driver's license along with e-mail address, physical address, and phone number. We do not collect any Personal Information from you unless you provide us with the Personal Information voluntarily.
- (b) **Third-party.** SCI has an Application Programming Interface ("API") with Independent Hauler's Association and other 3rd Party vendors who provide products and services to Owner Operators. Your Personal Information may be shared only after your authorization to participate in any of the vendor programs available. SCI also shares data with Banks and Financial Institutions, Confirm Choice and other background/MVR/Screening companies if the service is used. Insurance Carriers are also provided data for those participating in their programs.
- (c) **Payment Information.** If you choose to receive a payment from SCI or Adapt Payroll or participate in a vendor offered program that requires a fee, you will be required to provide us with your payment information, including, without limitation, bank account numbers, account details, ACH information, and similar data (collectively, "Payment Information"). Such Payment Information will be collected and transmitted to our vendors pursuant to the terms and conditions of their privacy policies and terms of use.
- (d) **Functional Information.** Certain features and functionalities of SCI's Websites and App are based on your location, IP Address, device information and mobile network. We also collect picture, device, and network information. In order to provide these features and functionalities while you are using your mobile device, we may, with your consent, automatically collect the information from your mobile device or wireless carrier and/or certain third-party service providers (collectively, "Functional Information"). Collection

of certain Functional Information from the App occurs only when the App is running on your device. You may decline to allow us to collect such Functional Information, in which case we will not be able to provide certain features or functionalities to you.

(e) **Other Information**. In addition to the Personal Information, Payment Information, and Functional Information, we may automatically collect or receive additional information regarding you and your use of the Company's Digital Resources; your interactions with us and our advertising; and information regarding your computer and mobile devices used to access the Company's Digital Resources (collectively, the "Other Information"). Such **Other Information** may include:

- (i) **From You**. Additional information about yourself that you voluntarily provide to us, such as your gender and your product and service preferences.
- (ii) **From Your Activity**. We may collect or receive information regarding:
 - (A) IP address, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or mobile device;
 - (B) browser type and language;
 - (C) referring and exit pages and URLs
 - (D) date and time; and
 - (E) details regarding your activity on the App, such as search queries and other performance and usage data.
- (iii) **From Cookies**. We may use both session cookies, which expire once you close the Website or App, and persistent cookies, which stay on your device until you delete them and other technologies to help us collect data and to enhance your experience with the Websites and App. Cookies are small text files an app can use to recognize a repeat visitor to the app. We may use cookies for various purposes, including to:
 - (A) type of mobile device or Computer;
 - (B) personalize your experience on the Company's Digital Resources;
 - (C) analyze which Digital Resources are visited and used most frequently; and
 - (D) measure and optimize advertising and promotional effectiveness.

If you do not want us to deploy cookies, you can opt out by setting your device to reject cookies. You can still use the Digital Resource if you choose

to disable cookies, although your ability to use some of the features may be affected.

2. How Information is Used and Shared.

- (a) You authorize us to use the Personal, Third-Party, Payment Information, Functional Information, and the Other Information (collectively, the “Information”) to:
 - (i) provide and improve our Websites, Apps, and other Digital Resources;
 - (ii) provide our services;
 - (iii) administer our promotional programs;
 - (iv) solicit your feedback; and
 - (v) inform you about our products and services.
- (b) In order to provide our services and administer our promotional programs, we may share the Information with our third-party vendors offering various programs as outlined herein.
- (c) We engage third-party companies and individuals to perform functions on our behalf. Examples may include providing technical assistance, customer service, marketing assistance, and administration of promotional programs. These other companies will have access to the Information only as necessary to perform their functions and to the extent permitted by law.
- (d) In an ongoing effort to better understand our clients, the App, and our products and services, we may analyze certain Information in anonymized and aggregate form to operate, maintain, manage, and improve our Digital Resources and/or such products and services. This aggregate information does not identify you personally. We may share and/or license this aggregate data to our affiliates, agents, business and promotional partners, and other third parties. We may also disclose aggregated user statistics to describe SCI’s Digital Resources and these products and services to current and prospective business partners and investors and to other third parties for other lawful purposes.
- (e) We may share some or all of your Information with any of our affiliated companies, subsidiaries, joint ventures, or other companies under common control with us.
- (f) As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, the Information may be part of the transferred assets.
- (g) SCI may share/upload/process any documents or information uploaded by users with external, reputable companies providing Artificial Intelligence Large Language Model

support in accordance with the terms and conditions of using one or more of these various services. This collaboration is essential for enhancing and maintaining the quality of our services. We ensure that all shared information is handled in compliance with our data protection standards.

(h) To the extent permitted by law, we may also disclose the Information:

- (i) when required by law, court order, or other government or law enforcement authority or regulatory agency; or
- (ii) whenever we believe that disclosing such Information is necessary or advisable, for example, to protect the rights, property, or safety of us or others, including you.

3. **Accessing and Modifying Information and Preferences.** If you provided us any Information, you may access, review, and/or make changes to some of that information by contacting SCI or through its Digital Resources. Some Information may be removed as required under Federal or State law, provided no superseding law exists that requires SCI maintain that information. Those individuals that do not receive a payment processed by SCI may request removal of their Information from SCI's Digital Resources.

We may also deliver notifications to your mobile device (e.g., push notifications). You can disable these notifications by deleting the relevant service or by changing the settings on your mobile device.

4. **Accessing Limitations.** To ensure the security and integrity of our services, SCI reserves the right to limit or prohibit access to specific resources when users connect via a Virtual Private Network (VPN). Such measures may be taken to prevent unauthorized access and to maintain the quality of service for all our users.

5. **How We Protect Your Information.** We take commercially reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases or the databases of the third parties with which we may share such Information, nor can we guarantee that the Information you supply will not be intercepted while being transmitted over the Internet. In particular, e-mail sent to us may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

6. **Important Notices to Non-U.S. Residents.** The App and its servers are operated in the United States. If you are located outside of the United States, please be aware that your Information, may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to use the App, you hereby irrevocably and unconditionally consent to such transfer, processing, and use in the United States and elsewhere.

7. **Changes to This Privacy Policy.** This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time. Any such changes will be posted on in the SCI Website, App, or emailed. By accessing the SCI Digital Resources after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of the Information is governed by the Privacy Policy in effect at the time we collect the Information. Please refer back to this Privacy Policy on a regular basis.
8. **How to Contact Us.** If you have questions about this Privacy Policy, please e-mail us at privacy@sciaadmin.com with "Privacy Policy" in the subject line or mail us at the following address: SCI, One Broad Street Plaza, Glens Falls, NY 12801.

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