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XPOFLEET BELGIUM PRIVACY POLICY

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1. Introduction

This privacy statement describes XPOFLEET BELGIUM's use of your personal data. We at XPOFLEET BELGIUM are committed to respecting your (online) privacy and recognize your need for appropriate protection and management of any personal data collected by or submitted to us (or carefully selected third parties acting on our behalf).

It is important to us that the personal data of the users of the app, the visitors to our websites, our (prospective) customers and our (future) partners ("you") is treated with care and that you are well informed about the way we process your personal data. We have written this privacy statement to tell you which data we process, how, why and how long we do this and what your rights are.

Below we explain in more detail how we process your personal data. For purposes of this privacy statement, "personal data" means any information that relates to you and identifies you personally, either alone or in combination with other information available to us.

This privacy statement applies to all personal data that is collected and used by us when you visit this website and/or when you purchase/use the products and services offered on this website and/or when you interact with us through social media or otherwise.

This privacy statement applies to all personal data XPOFLEET BELGIUM processes as the controller. XPOFLEET BELGIUM may also be a processor processing information on behalf of a client. In such case a separate data processor's agreement will be concluded with the client.

XPOFLEET BELGIUM BV, with registered office at Coremansstraat 34, 2600 Berchem, Belgium, Crossroads Bank for Enterprises and VAT number 0464.168.358, RL Antwerp (district Antwerp) is referred to as "XPOFLEET BELGIUM", "we" or "us".

2. When do we collect personal data?

We collect personal data when:

- you make use of the app;
- you request support for the app;
- you request software downloads;
- you create a user account (login user name and password);
- you submit questions or comments to us;

3. What personal data do we collect?

The types of personal data collected include:

- your first and last name;
- your title and your company's name;
- your home, billing, or other physical address (including street name, name of a city or town, state/province, postal code);
- your e-mail address;
- your telephone number;
- any other identifier that permits XPOFLEET BELGIUM to make physical or online contact with you;
- any other information that you provide to us when you are communicating with us.

Whenever we collect personal data directly from you, we will indicate whether the provision of personal data is mandatory. Such will be the case where we require personal data to comply with legal or contractual obligations: if such data are not provided, then we will not be able to manage our contractual relationship, or to meet obligations placed on us. In all other cases, the active provision of requested personal data is optional.

4. For what purposes and on what legal basis do we use your personal data?

We will use your personal data for the following purposes:

- To establish and execute a contract with you for using the app;
- As required by XPOFLEET BELGIUM to enable our business and pursue our legitimate interests. In particular:
 - we monitor the use of our products and services, and may use your personal data to help us monitor, improve and protect our products, content, services and websites;
 - we may use personal data you provided us with to personalize our products or services for you;
 - we may use your personal data for the purposes of ensuring network and information security, including preventing unauthorized access to electronic

- communications networks and stopping damage to computer and electronic communication systems – online and in our physical offices;
- we may monitor any customer account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law;
- we may use your personal data for market research and marketing purposes;
- we may process data for administrative transfers within a group of companies; and

More information about how we have balanced our legitimate interest with your privacy interests can be obtained upon request via privacy@xpofleet.com.

- For compliance with applicable laws and protection of our legitimate business interests and legal rights, including, but not limited to, use in connection with legal claims, compliance, regulatory, investigative purposes (including disclosure of such information in connection with legal process or litigation) and accounting/tax purposes.

5. With whom will we share these data?

We need the help of third parties to be able to offer you our website and our products and services. Where necessary we will share your information with our service providers and professional advisers (e.g. IT providers, CRM providers, marketing support providers (such as agencies which manage our social media accounts), social media providers such as LinkedIn, analysts, customer service providers, business development providers and legal service providers). We have concluded agreements with our service providers to protect your personal data.

Otherwise we will not share your information with any third party or affiliated company, unless we have your permission (for example: if we wish to share your details with other XPOFLEET BELGIUM entities or group companies), where this is necessary in connection with the purposes above or with legal claims or when we have a legal obligation to do so.

Third party service providers may process your information on behalf of XPOFLEET BELGIUM for the purposes mentioned in Section 4 above. When we share your data with these parties, we make sure that appropriate safeguards are taken to protect your information.

If we transfer your data overseas?

We may transfer your personal data to third parties (e.g., service providers) overseas, which may involve the transfer of personal data to countries outside the European Economic Area which have different data protection standards to those which apply in the European Economic Area.

Some of these countries are subject to a European Commission adequacy decision. For other countries, we have put in place European Commission-approved standard contractual clauses (SCC's) within the XPOFLEET BELGIUM group or with the relevant third party to protect this personal data. We also rely on other permitted data transfer mechanisms such as relying on the third party binding corporate rules (approved by EU

data protection authorities and put in place to protect your personal data). You have a right to ask us for a copy of the safeguard used (by contacting us via privacy@xpofleet.com).

6. How long do we store your data?

We will always only keep your data for as long as we reasonably need it for the purposes for which it was collected. After that time your personal data will be erased, unless we have a statutory right or obligation to further keep this data.

7. How do we protect your data?

We are committed to maintain a high standard of security and have put in place robust technical and organizational measures for the protection of your data in accordance with the current, general state of the art technologies, especially to protect the data against loss, falsification or access by unauthorized third persons. We have implemented technical and organisational measures following the ISO27001-standard, where we have achieved certification.

We for instance conclude confidentiality agreements with relevant parties, we use encryption if needed, periodically we make back-ups, our personnel is well aware of the importance of the protection of personal data etc.

8. Your rights

You have the right to ask us:

- for an overview and/or a copy of your personal data that we hold on you;
- to update or correct your personal data in order to make it accurate;
- to delete your personal data from our records in certain circumstances;
- to restrict the processing of your personal data in certain circumstances;
- to transfer (some of) this information to other organizations.

and you are entitled to / may also:

- object to us processing your personal data in some cases (in particular where we do not have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing or profiling);
- withdraw your consent at any time, where we are using your personal data with your consent. Please note that this will not affect the processing of your personal data prior to the withdrawal of your consent.

There are however some exceptions to these rights, for example: it will not be possible for us to delete your data if we are required by law to keep them or if we hold your data in connection with a contract with you. Similarly, access to your data may be refused if making the information available would reveal personal information about another person or if we are legally prevented from disclosing such information.

9. Changes

We are committed to adhere to the fundamental principles of privacy and data protection. We therefore regularly review this privacy statement in order to ensure that it is free of errors and clearly visible on the app, that it contains appropriate and accurate information about your rights and our processing activities, and that it is implemented and is compliant with applicable law.

We may update this privacy statement from time to time to keep it up to date, to keep pace with new developments and opportunities relating to the Internet and to stay in line with applicable laws. If we make significant changes to this privacy policy, we will inform you by posting a notification on the website along with an updated version of the privacy statement, by e-mail or by requesting your consent again.

10. Contacting us, questions and complaints

We hope that we can satisfy questions you may have regarding the processing of your data.

Should you have any queries or concerns about how we process your data, or would you like to opt out of marketing, you can always contact our **Data Protection Officer** using the following contact details: XPOFLEET BELGIUM, Coremansstraat 34, 2600 Berchem, Belgium, Attn: **DPO** by email at privacy@xpofleet.com.

We will address your possible concerns and attempt to resolve any problem within 1 month.

In the event you have unresolved concerns, you also have the right to lodge a complaint to a data protection authority of the country in which you live or work or the country in which we are located.

These are the relevant contact details of the data protection authority in Belgium: Gegevensbeschermingsautoriteit, Drukpersstraat 35, 1000 Brussel, Tel +32 (0)2 274 48 00, Fax +32 (0)2 274 48 35, contact@apd-gba.be.