



SEMICAB PRIVACY & CONFIDENTIALITY POLICY  
v2018.1

**For all Visitors to Our Website and Users of our Services**

**1.1** SemiCab operates its marketing website(s) and various services, applications, products and content (the “**Service**”). We post our Privacy and Confidentiality Policy to inform you (collectively “**you**” or “**your**”), as a visitor to our marketing website, a user of the Service, what kinds of information we may gather about you, how we may use that information, whether we disclose it to anyone, the choices you have regarding our use of information, and your ability to correct that information. By accessing the Service, you are consenting (i) to this Privacy and Confidentiality Policy and (ii) to having your personal data transferred to and/or processed in accordance with the terms of this Privacy and Confidentiality Policy. SemiCab collects all data collected through [www.SemiCab.com](http://www.SemiCab.com) and is responsible for implementing and ensuring compliance with this Privacy and Confidentiality Policy.

**1.2** Please note that this Privacy and Confidentiality Policy applies only to the Service, and not to other companies’ or organizations’ websites to which we link or sites that you may access via the Service. These sites may collect information about you. SemiCab does not control sites that are operated by others and is not responsible for the information practices of these sites and this Privacy and Confidentiality Policy does not address the information practices of those websites or operators thereof.

**1.3** As set forth in this Privacy and Confidentiality Policy, we process personal data for, or based on, one or more of the following legal bases:

- **Performance of a Contract.** We use personal data to enter into and to perform under, an agreement you have accepted with SemiCab to govern your access to the Service (the “**SemiCab Agreement**”).
- **Legitimate Interests.** We use personal data for our legitimate interests, including contact information, Service interactions, Service usage data to perform certain Service requirements for you and Website usage data.
- **Compliance with Legal Obligations and Protection of Individuals.** We may use personal data to comply with the law and our legal obligations, as well as to protect you and other individuals or businesses from certain harms.
- **Your Consent.** We process certain personal data because you have given us your consent to process it in that manner.

**Visitors to Our Marketing Websites**

**2.1** When you visit our marketing website, [www.SemiCab.com](http://www.SemiCab.com) and/or any affiliated SemiCab owned website (collectively, the “**Website**”), if you request information from us, you will be asked to provide basic information about you, including your name, company, title, country, e-mail address, your company’s industry and other information that may assist us in providing services to you (the “**Basic Information**”). You will be provided with a copy of these terms prior to providing any such information to us and upon your consent, SemiCab will collect the Basic Information and fulfill your applicable request. SemiCab does not intentionally or knowingly collect sensitive personal information such religious beliefs, political opinions, health, sexual orientation, race or union membership. The Service is not intended for and does not knowingly collect information from children under the age of 13. Your consent to store and use your Basic Information will be requested and will not be stored if you do not provide your consent, however if you fail to provide such consent or rescind your consent at any time, certain services may be impaired or unavailable.

**2.2** We do not sell, trade, or rent to any third party any of the Basic Information that you provide to us prior to you becoming a subscriber to the Service. We may provide Basic Information to third parties who provide services to us, and who agree to abide by the terms of this Privacy and Confidentiality Policy. We will use the Basic Information you provide to respond to your requests for additional information by email and also by telephone if you have consented to telephone contact. We also will use the Basic Information for future mailings informing you of products and services available to you if you have consented to such. If you would like to cancel your consent to receive future mailings, simply follow the unsubscribe directions at the bottom of the mailing or send us an e-mail with your name referencing “Remove” in the subject line to [privacy@SemiCab.com](mailto:privacy@SemiCab.com). We will use the Basic Information to ensure in our legitimate interests that content from our site is presented in the most effective manner for you and for your computer and/or device (as used herein, “**Computer**”). If technical or site visit information (“**Technical Information**”) is collected pursuant to your consent, legitimate interests shall include: our ability to administer our

site under our terms and for internal operations, including troubleshooting, and, in our legitimate interests, data analysis, testing, research, statistical and survey purposes; our ability to improve our site to ensure that content is presented in the most effective manner for you and for your Computer; our ability to allow you to participate in interactive features of our service, when you choose to do so; as part of our legitimate efforts to keep our site and services safe and secure; our legitimate interest of measuring or understanding the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them in our legitimate interests and subject to your stated preferences where relevant (collectively, the “**Technical Information**”).

**2.3** Like many websites and/or services, the Service uses cookies, small text files which are placed on your Computer or device to allow us to provide you with a customized experience. A cookie cannot read personal data off your hard disk or read cookie files created by other websites; the only personal information a cookie can contain is information you supply yourself. These cookies are destroyed when you log out and cannot be used to track other information. You may access most of the Service without accepting cookies; however, some functionality may be lost by disabling cookies. Most web browsers automatically accept cookies, but you may change your web browser settings to prevent automatic acceptance of cookies or to notify you when a cookie is set. The following lists the types of cookies used on our website. To use the site and Services your consent is required.

Type of Cookies	Description	Managing Settings
<b>Required cookies</b>	Required cookies enable you to navigate Service and use its features, such as accessing secure areas of the websites and using SemiCab services.	To learn how to opt out of required cookies after your initial consent is provided using your browser settings <a href="http://www.allaboutcookies.org/manage-cookies/stop-cookies-installed.html">http://www.allaboutcookies.org/manage-cookies/stop-cookies-installed.html</a> . Please note that your access to the Service will be severely impaired or disabled upon rescinding such consent.
<b>Performance cookies</b>	Performance cookies collect information about how visitors use the Service, including which pages visitors go to most often and if they receive error messages from certain pages. These cookies do not collect information that individually identifies a visitor. All information these cookies collect is aggregated and anonymous. It is only used to improve functionality and performance of our site.	Failing to provide consent or opting out after providing initial consent may impact the functionality of the Service. To learn how to opt out of performance cookies after your initial consent is provided using your browser settings <a href="http://www.allaboutcookies.org/manage-cookies/stop-cookies-installed.html">http://www.allaboutcookies.org/manage-cookies/stop-cookies-installed.html</a> .
<b>Functionality cookies</b>	Functionality cookies remember information you have entered or choices you made (such as your username, language, or your region) and provide enhanced, personal features.	Failing to provide consent or opting out after providing initial consent may impact the functionality of the Service. To learn how to opt out of functionality cookies after your initial consent is provided using your browser settings <a href="http://www.allaboutcookies.org/manage-cookies/stop-cookies-installed.html">http://www.allaboutcookies.org/manage-cookies/stop-cookies-installed.html</a> .
<b>Targeting or Advertising cookies</b>	Third party advertising and retargeting pixels and cookies are used to manage and track the effectiveness of our marketing efforts. From time-to-time, third parties track and analyze usage and volume information from individuals who are referred to the site from ads. Third party advertising networks may collect IP addresses and	To learn more about these and other advertising networks and their opt out instructions after your initial consent is provided <a href="http://www.allaboutcookies.org/manage-cookies/stop-cookies-installed.html">http://www.allaboutcookies.org/manage-cookies/stop-cookies-installed.html</a> .

	<p>other information from web beacons, emails, and on third-party websites, in order to provide advertisements about products and services tailored to your interests. You may see these advertisements on other sites.</p>	
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**2.4** Our system logs some basic and generic information about your Computer, including its:

- IP address
- Operating system
- Browser software

We use this information about your Computer or device to perform routine maintenance, to generate aggregate traffic reports, and enhance the performance of our Service on different browsers and devices.

**2.5** We are committed to providing reasonable and practical access to you to identify and to correct any inaccuracies in the information you may provide. Visitors who have provided Basic Information on our Website can contact us at [privacy@SemiCab.com](mailto:privacy@SemiCab.com) to correct any inaccuracies.

### **3 SemiCab Service Information**

**3.1** If you choose to purchase access to the Service, you may be asked to provide Basic Information to act as the point of contact for SemiCab and Technical Information may be collected pursuant to your consent. This information may be shared with financial service providers and payment providers to enable processing of any payments for the Services, where applicable, but in all such instances solely in accordance with the terms and conditions of this policy.

**3.2** Once you purchase access to the Service, your Basic Information, Technical Information, financial information, geolocation data, other confidential data and service details will be used by SemiCab and may be shared with members of the SemiCab group and SemiCab service providers and partners as necessary in order to carry out our obligations arising from any contracts entered into between you and us and to provide you with the Service that you request from us. The SemiCab group means our subsidiaries, ultimate holding company and its subsidiaries. We will ensure that any transferors are engaged on terms that are at least equivalent to the terms of this Privacy and Confidentiality Policy. To this end we shall know the identity of each transferor, their location, and the purpose for each transfer. In certain circumstances, we may modify the format of information you provide to us to make the format compatible with the Service. We will not disclose your Basic Information and your financial information or confidential data without your consent, except as permitted by this Privacy and Confidentiality Policy or your SemiCab Terms and Conditions of Use for the Service or any other SemiCab Agreement.

**3.3** Passwords and identity or security devices are private entry keys into the respective SemiCab account. A user should never share his or her password or identity or security devices with anyone. Users should select passwords that are difficult to guess and change them frequently. Passwords should not be stored on the applicable device or on written notes near the device. SemiCab is not responsible if the foregoing practices are not complied with.

**3.4** We will use the information you provide to contact you, if necessary, to service your account, notify you about changes to our service or for other administrative purposes. We may also access and use your information to resolve disputes, to troubleshoot problems, to enforce our SemiCab Agreement, for marketing purposes, or, in our legitimate interests, for data analysis, testing, research and statistical and survey purposes, all subject to your consent and consent-rescission rights as set forth herein.

**3.5** When this Privacy and Confidentiality Policy offers subscribers the opportunity to consent to collection (or “opt in”) you will do so by accepting these terms and conditions on our website or in the Service. To “opt out,” you may contact SemiCab Customer Services at [privacy@SemiCab.com](mailto:privacy@SemiCab.com).

**3.6** You also have the opportunity to select certain types of emails that you would like to receive from SemiCab. This can be done easily by contacting us at [privacy@SemiCab.com](mailto:privacy@SemiCab.com).

**3.7** We are committed to providing reasonable and practical access to you to identify and to correct any inaccuracies in the information you may provide. You can contact SemiCab Customer Services at [privacy@SemiCab.com](mailto:privacy@SemiCab.com) to maintain up to date account information.

#### **Disclosure of Information**

**4.1** We may disclose information about you to such third parties that you authorize.

**4.2** SemiCab shall disclose information provided by you and about you to the extent required by law through subpoena, search warrant or other legal process or requirement or as necessary to protect the rights, property, or safety of SemiCab, our subscribers, or others.

#### **Your Rights**

**7.1** You have a variety of legal rights regarding the collection and processing of personal data. You may exercise these rights, to the extent they apply to you, by contacting us at [privacy@SemiCab.com](mailto:privacy@SemiCab.com). Please be prepared provide reasonable information to identify yourself and authenticate your requests.

**7.2** We will endeavor to respond to your request to access, update or delete your information as soon as practicable after you provide such updates to us at [privacy@SemiCab.com](mailto:privacy@SemiCab.com).

**7.3** SemiCab will notify you of a breach concerning your personal data where the breach is likely to result in a high risk to your rights and freedoms.

**7.4** SemiCab commits to resolve complaints about your privacy and our collection or use of your personal information. If you have inquiries or complaints regarding this privacy policy, you should first contact SemiCab at [privacy@SemiCab.com](mailto:privacy@SemiCab.com).

**7.5** The rights you may have vary depending on the laws of the jurisdiction applicable to you but may include:

- The right to know whether, and for what purposes, we process personal data about you;
  - The right to be informed about the personal data we collect and/or process about you;
  - The right to learn the source of personal data about you we process, where we obtain that personal data from a source other than you;
  - The right to access, modify, and correct personal data about you (as set forth in more detail below);
  - The right to know with whom we have shared personal data about you, for what purposes, and what personal data has been shared (including whether personal data was disclosed to third parties for their own direct marketing purposes);
  - Where processing of personal data about you is based on consent, the right to withdraw your consent to such processing;
- and

#### **Miscellaneous**

**8.1** SemiCab reserves the right to change this Privacy and Confidentiality Policy, or any other SemiCab policy or practice, at any time. You are responsible for checking this page periodically for changes. When we intend to make material changes to this Privacy and Confidentiality Policy, we will post those changes on this page and such changes are effective immediately upon posting. Your use of SemiCab following any posted change(s) to the Privacy and Confidentiality Policy will be deemed acceptance of such change(s). This Privacy and Confidentiality Policy is incorporated into, and part of, the SemiCab Agreement between you and SemiCab, if any. Where consent is required in your jurisdiction, you will be prompted to consent to collection of your personal information on our website or when attempting to use the Service after we make such changes and your failure to consent to such changes in these terms may result in cancellation of or impairment to your access to the Website and/or the Service.

**8.2** SemiCab complies with applicable privacy laws and regulations in the United States of America where the services are rendered and accessible.

**8.3** In the event that SemiCab, or substantially all of its assets, are acquired by one or more third parties as a result of an acquisition, merger, sale, reorganization, consolidation or liquidation, such databases containing your information may be one of the transferred assets. In using the Services, you consent to such transfer of your information. Where consent is required in

your jurisdiction, you will be prompted to consent to such transfer on our website or when attempting to use the Service after we make such changes and your failure to consent to such changes in these terms may result in cancellation of or impairment to your access to the Website and/or the Service.

**8.4** SemiCab takes reasonable precautions to protect your Basic Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. Due to the inherent nature of the Internet as an open global communications vehicle, SemiCab cannot guarantee that your information will be absolutely safe from intrusion by others, such as hackers. Any unauthorized access to or use of the SemiCab sites, Services or information collected and maintained by the SemiCab sites or Services should be immediately brought to the attention of SemiCab Customer Services at [privacy@SemiCab.com](mailto:privacy@SemiCab.com). SemiCab will investigate, and if necessary take action to prevent or halt, any violation of this Privacy and Confidentiality Policy of which it becomes aware. If you contact SemiCab by e-mail, you should be aware that e-mail transmission might not be secure. A third party could view information you send by e-mail in transit. SemiCab will have no liability for disclosure of your information due to errors or unauthorized acts of third parties during transmission.