

Effective Date: April 1st, 2018

We at Turvo know you care about how your personal information is used and shared, and we take your privacy seriously. Please read the following to learn more about our Privacy Policy. **By using or accessing the Services in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways.**

Remember that your use of Turvo's Services is at all times subject to the [Terms of Use](#), which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the [Terms of Use](#).

What does this Privacy Policy cover?

This Privacy Policy covers our treatment of personally identifiable information ("Personal Information") that we gather when you are accessing or using our Services, but not to the practices of companies we don't own or control, or people that we don't manage. We gather various types of Personal Information from our users, as explained in more detail below, and we use this Personal Information internally in connection with our Services, including to personalize, provide, and improve our services, to allow you to set up a user account and profile, to contact you and allow other users to contact you, to fulfill your requests for certain products and services, and to analyze how you use the Services. In certain cases, we may also share some Personal Information with third parties, but only as described below.

Please note that the Services are hosted and operated in the United States and are subject to United States law. By using the Services, you acknowledge and agree that your Personal Information will be transferred to the United States and processed and stored on servers in the United States.

As noted in the [Terms of Use](#), we do not knowingly collect or solicit personal information from anyone under the age of 13. If you are under 13, please do not attempt to register for the Services or send any personal information about yourself to us. If we learn that we have collected personal information from a child under age 13, we will delete that information within a reasonable

time. If you believe that a child under 13 may have provided us personal information, please contact us at support@turvo.com.

Will Turvo ever change this Privacy Policy?

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time as well, but we will alert you to changes by providing notice through the Services, by sending you an email, and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. We encourage you to periodically review this Privacy Policy for the latest information on our privacy practices. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is collected.

What Information does Turvo Collect?

Information You Provide to Us:

We receive and store any information you knowingly provide to us. For example, through the registration process, through your account settings, when you upload or provide documents to us, use our logistics services, contact customer support, or otherwise communicate with us, we may collect Personal Information such as your name, email address, phone number, postal address, employer's name, job title, profile picture, payment method, shipment details, notes, messages, uploaded images and documents, and other information you choose to provide. Certain information may be required to register with us or to take advantage of some of our features.

We may communicate with you if you've provided us the means to do so. For example, if you've given us your email address, we may send you promotional email offers on behalf of other businesses, or email you about your use of the Services. Also, we may receive a confirmation when you open an email from us. This confirmation helps us make our communications with you more interesting and improve our services. If you do not want to receive

communications from us, please indicate your preference by following the instructions in those communications.

Information Collected Automatically:

Whenever you interact with our Services, we automatically receive and record information on our server logs from your browser or device, which may include (but is not limited to) your IP address, access dates and times, geolocation data, route data, driving habits, device identification, cell tower triangulation, distance traveled, “cookie” information, information regarding the type of browser and/or device you’re using to access our Services, and the page or feature you requested. “Cookies” are identifiers we transfer to your browser or device that allow us to recognize your browser or device and tell us how and when pages and features in our Services are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your device’s acceptance of cookies, but this may prevent you from taking advantage of some of our features.

Our advertising partners may also transmit cookies to your browser or device, when you click on ads that appear on the Services. Also, if you click on a link to a third party website or service, a third party may also transmit cookies to you. Again, this Privacy Policy does not cover the use of cookies by any third parties, and we aren’t responsible for their privacy policies and practices. Please be aware that cookies placed by third parties may continue to track your activities online even after you have left our Services, and those third parties may not honor “Do Not Track” requests you have set using your browser or device.

We may use this data to customize content for you that we think you might like, based on your usage patterns. We may also use it to improve the Services – for example, this data can tell us how often users use a particular feature of the Services, and we can use that knowledge to make the Services interesting to as many users as possible.

Information Collected From Third Parties:

If your customer or business partner uses one of our enterprise solutions, such as Turvo Enterprise, we may receive information about you from your customer or business partner. Additionally, we may also receive or collect information about you from other sources, including our third party partners, from public records and third party websites, services and systems that are

accessed in the ordinary course of business. This helps us to update, expand and analyze our records, develop new features and product capabilities, and create more tailored services and platform to Turvo customers.

Information Collected From Other Websites and Do Not Track Policy:

Through cookies we place on your browser or device, we may collect information about your online activity after you leave our Services. Just like any other usage information we collect, this information allows us to improve the Services and customize your online experience, and otherwise as described in this Privacy Policy. Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. Our Services do not support Do Not Track requests at this time, which means that we collect information about your online activity both while you are using the Services and after you leave our Services.

Will Turvo Share Any of the Personal Information it Receives?

We do not rent or sell your Personal Information in personally identifiable form to anyone. We may share your Personal Information with third parties as described in this section:

Information that’s been anonymized: We may anonymize your Personal Information so that you are not identified as an individual, and provide that information to our partners (such as, for example, Google Analytics). We may also provide aggregate usage information to our partners (or allow partners to collect that information from you), who may use such information to understand how often and in what ways people use our Services, so that they, too, can provide you with an optimal online experience. However, we never disclose aggregate usage or anonymized information to a partner (or allow a partner to collect such information) in a manner that would identify you as an individual person.

Advertisers: We allow advertisers and/or merchant partners (“Advertisers”) to choose the demographic information of users who will see their advertisements and/or promotional offers and you agree that we may provide

any of the information we have collected from you in non-personally identifiable form to an Advertiser, in order for that Advertiser to select the appropriate audience for those advertisements and/or offers. For example, we might use the fact you are located in San Francisco to show you ads or offers for San Francisco businesses, but we will not tell such businesses who you are. Or, we might allow Advertisers to display their ads to users with similar usage patterns to yours, but we will not disclose usage information to Advertisers except in aggregate form, and not in a manner that would identify you personally. Note that if an advertiser asks us to show an ad to a certain audience or audience segment and you respond to that ad, the advertiser may conclude that you fit the description of the audience they were trying to reach.

We may deliver a file to you through the Services (known as a “web beacon”) from an ad network. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Because your web browser must request these advertisements and web beacons from the ad network’s servers, these companies can view, edit, or set their own cookies, just as if you had requested a web page from their site. You may be able to opt-out of web beacon tracking conducted by third parties through our Services by adjusting the Do Not Track settings on your browser; please note that we don’t control whether or how these third parties comply with Do Not Track requests.

Affiliated Businesses: In certain situations, businesses or third party websites we’re affiliated with may sell or provide products or services to you through or in connection with the Services (either alone or jointly with us). You can recognize when an affiliated business is associated with such a transaction or service, and we will share your Personal Information with that affiliated business only to the extent that it is related to such transaction or service. We have no control over the policies and practices of third party websites or businesses as to privacy or anything else, so if you choose to take part in any transaction or service relating to an affiliated website or business, please review all such business’ or websites’ policies.

Agents: We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you; for example, we may use a payment processing company to receive and process your credit card transactions for us. Unless we tell you differently, our agents do not have any right to use the Personal Information we share with them beyond what is necessary to assist us.

Business Transfers: We may choose to buy or sell assets, and may share and/or transfer customer information in connection with the evaluation of and entry into such transactions. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information could be one of the assets transferred to or acquired by a third party.

Protection of Company and Others: We reserve the right to access, read, preserve, and disclose any information that we believe is necessary to comply with law or court order; enforce or apply our [Terms of Use](#) and other agreements; or protect the rights, property, or safety of Company, our employees, our users, or others.

How do I protect my account information?

Your account is protected by a password for your privacy and security. While we limit access to your information to authorized employees and contractors who need to know that information in order to operate, develop or improve our Services, you must prevent unauthorized login access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

Is Personal Information about me secure?

We endeavor to protect the privacy of your account and other Personal Information we hold in our records, but unfortunately, we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

What Personal Information can I access?

Through the Turvo applications, you may access, and, in some cases, edit or delete the following information you've provided to us:

- name and password
- email address

- location
- user profile information

The information you can view, update, and delete may change as the Services change. If you have any questions about viewing or updating information we have on file about you, please contact us at support@turvo.com.

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Information to third parties for such third parties' direct marketing purposes. Turvo does not share your personally identifiable information with third parties for the third parties' direct marketing purposes unless you provide us with consent to do so.

What choices do I have?

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our features.

You may be able to add, update, or delete information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. Some information may remain in our records after your deletion of such information from your account. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally.

What if I have questions about this policy?

If you have any questions or concerns regarding our privacy policies, please send us a detailed message to support@turvo.com, and we will try to resolve your concerns. Otherwise, you may write us at Turvo, Inc., Attn: Legal, 1455 Market Street, Suite 400, San Francisco, CA 94103 (if you reside in the U.S.), or at Turvo India Private Ltd., Attn: Legal, Vijzelstraat 68-78, 1017 HL Amsterdam, Netherlands (if you do not reside in the U.S).