

Movelink Privacy Notice

I. Introduction

The Movelink mobile applications and website match carriers with shippers. To enable these applications and websites (the “services”), Movelink Limited and its affiliates and subsidiaries (collectively, “Movelink”) collect and use certain information about our users when they use or communicate with us regarding our services. This notice describes the personal data we collect from users of the services, how this data is used and shared, and users’ choices regarding this data.

II. Overview

A. Scope and application

This notice applies to users of Movelink’s services anywhere in the world.

This notice applies to all users of Movelink’s apps, websites, features, or other services anywhere in the world:

- Carriers: individuals or entities that offer motor vehicles used to transport goods
- Commercial drivers: individuals licensed to operate motor vehicles to transport goods for or on behalf of carriers
- Shippers: any user of the services that is identified as the shipper, consignor, or consignee, or that owns the goods being transported
- Dispatchers: individuals who assign motor vehicles and commercial drivers for conveyance of freight

All those subject to this notice are referred to as “users” in this notice.

The practices described in this notice are subject to applicable laws in the places in which we operate. This means that we engage in the practices described in this notice in a particular country or region only if permitted under the laws of those places.

B. Data controller and transfer

Movelink is the data controller for the personal data collected in connection with the use of Movelink’s services

Movelink operates, and processes data, globally. We may also transfer data to countries other than the one where our users live or use Movelink’s services. We do so in order to fulfill our agreements with users, such as our [Terms of Use](#), or based on users’ prior consent, adequacy decisions for the relevant countries, or other transfer mechanisms as may be available under applicable law.

Questions, comments, and complaints about Movelink’s data practices can be submitted [here](#).

III. Data collections and uses

A. The data we collect

Movelink collects:

- Data provided by users to Movelink, such as during account creation
- Data created during use of our services, such as location, app usage, and device data
- Data from other sources, such as Movelink partners and third parties that use Movelink APIs

The following data is collected by or on behalf of Movelink:

1. Data provided by users.

This includes:

- **User profile:** We collect data when users create, modify, or log in to their account; when they request support from or otherwise communicate with us; and if they interact with the services as a commercial driver or carrier dispatcher, submit information about their vehicle or insurance, or otherwise communicate with us. This may include their name, email address, phone number, login name and password, postal address, profile picture, government identification documents, including driver's license numbers and images, birthdate, signature, and photo. This also includes vehicle registration information, insurance information, payment information, and other information they choose to provide.
- **Demographic data:** We may collect demographic data about users, including through user surveys. We may also receive demographic data about users from third parties.
- **Data submitted through communications with Movelink:** We collect the information users submit when they contact Movelink customer support, provide facility ratings, or otherwise contact Movelink. This may include feedback, photographs, or other recordings collected by users.

2. Data created during use of our services.

This includes:

- **Location data:** Our services require that we collect precise or approximate location data from commercial drivers' and dispatchers' mobile devices. We only collect such data where users have granted us permission to do so through the permission system used by their mobile device.

Movelink collects this data when the Movelink app is running in the foreground (app open and on-screen) or background (app open but not on-screen) of their mobile device.

- **Transaction information:** We collect transaction information related to the use of our services, including the type of services requested or provided, date and time the service was provided, distance traveled, payment amounts, and other related transaction details.

- **Photos:** We collect photos of bills of lading, freight, and other matters directly related to the services where users have uploaded such photos to the Movelink apps or websites.
- **Usage data:** We collect data about how users interact with our services (including analytics that we or third parties conduct for the purpose of improving our services). This includes data such as access dates and times, app features and/or pages viewed, app crashes and other system activity, type of browser, and third-party sites or services used before interacting with our services. In some cases, we collect this data through cookies, pixels, tags, and similar tracking technologies that create and maintain unique identifiers. To learn more about these technologies, please see our Cookie Notice below.
- **Device data:** We may collect data about the devices used to access our services, including the hardware models, device IP address, operating systems and versions, software and file names and versions, preferred language, unique device identifiers, advertising identifiers, serial numbers, device motion data, and mobile network data.
- **Communications data:** We enable users to interact with one another and Movelink through Movelink's mobile apps and websites. To provide this service, Movelink receives some data regarding the calls, texts, or other communications, including the date and time of the communications and the content of the communications. Movelink may also use this data for customer support services (including to resolve disputes between users), for safety and security purposes, to improve our products and services, and for analytics.

3. Data from other sources.

For example:

- We may receive information about commercial drivers from other users such as carriers or shippers, or from other third parties. This includes information about their location, or feedback they receive from other Movelink users.
- We might receive information about a commercial driver or carrier from the regulatory bodies involved in the regulation of carriers.
- We may receive names and contact information of other users such as third-party brokers, carriers and/or commercial drivers from shippers who request quotations or services.
- If users engage with a separate app or website that uses our API (or whose API we use), we may receive information about them or their connections from that site or app.
- We may receive information from publicly available sources and marketing service providers for lead generation.

Movelink may combine the data collected from these sources with other data in its possession.

B. How we use personal data

Movelink collects and uses data to arrange for reliable and convenient transportation of shipments, delivery, and other products and services. We also use the data we collect:

- To enhance the safety and security of our users and services
- For customer support
- For research and development
- To send marketing and non-marketing communications to users
- In connection with legal proceedings

Movelink does not sell or share user personal data with third parties for their direct marketing, except with users' consent.

Movelink uses the data it collects for purposes including:

1. Providing services and features.

Movelink uses the data we collect to provide, personalize, maintain, and improve our products and services.

This includes using the data to:

- Create and update users' accounts
- Request quotations from, and enable the matching of shipments with, third-party brokers, carriers and/or commercial drivers
- Track the status and location of shipments transported through the services, and determine other data relating to use of the services, such as how long a carrier and/or commercial driver has been at a pickup location to determine detention payments
- Send communications to other users of the services, such as shippers, regarding the progress of shipments transported through the services, such as estimated delivery arrival and delivery times
- Personalize and improve the services, including to develop new features and to provide or recommend shipments, features, content, and advertisements
- Offer, process, or facilitate payments for the services
- Perform internal operations necessary to provide our services, including to troubleshoot software bugs and operational problems; to conduct data analysis, testing, and research; and to monitor and analyse usage and activity trends

2. Safety and security.

We use personal data to help maintain the safety, security, and integrity of our services and users. This includes:

- Using device, location, profile, usage, and other data to prevent, detect, and combat fraud or unsafe activities
- Authenticating users
- Developing safety features

3. Customer support.

Movelink uses the information we collect (including recordings of customer support calls with notice to and the consent of the user) to provide customer support, including to:

- Direct questions to the appropriate customer support person
- Investigate and address user concerns
- Monitor and improve our customer support responses and processes

4. Research and development.

We may use the data we collect for testing, research, analysis, product development, and machine learning to improve the user experience. This helps us to improve and enhance the safety and security of our services, improve our ability to prevent the use of our services for illegal or improper purposes, develop new features and products, and facilitate finance solutions in connection with our services.

1) Marketing. Movelink may use the data we collect to market our services to our users. This includes sending users communications about Movelink services, features, promotions, sweepstakes, studies, surveys, news, updates, and events. For further details about third-party marketing, see below.

- We may use the data we collect to personalize the marketing communications (including advertisements) that we send, including based on user location, past use of Movelink's services, and user preferences and settings.

2) Non-marketing communications. Movelink may use the data we collect to generate and provide users with receipts; inform them of changes to our terms, services, or policies; or send other communications that aren't for the purpose of marketing the services or products of Movelink or its partners.

3) Legal proceedings and requirements. We may use the personal data we collect to investigate or address claims or disputes relating to use of Movelink's services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.

C. Cookies and third-party technologies

Movelink and its partners use cookies and other identification technologies on our apps, websites, emails, and online ads for purposes described in this notice.

Cookies are small text files that are stored on browsers or devices by websites, apps, online media, and advertisements. Movelink uses cookies and similar technologies for purposes such as:

- Authenticating users
- Remembering user preferences and settings
- Determining the popularity of content
- Delivering and measuring the effectiveness of advertising campaigns

- Analyzing site traffic and trends, and generally understanding the online behaviors and interests of people who interact with our services

We may also allow others to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet, and to track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs, and other technologies to identify the devices used by visitors to our websites, as well as when they visit other online sites and services.

Please see our Cookie Notice below for more information regarding the use of cookies and other technologies described in this section.

D. Data sharing and disclosure

Some of Movelink's products, services, and features require that we share data with other users or at a user's request. We may also share data with our affiliates, subsidiaries, and partners, for legal reasons or in connection with claims or disputes.

Movelink may share the data we collect:

1. With other users or third parties

This includes sharing data:

With other users or with third parties who require, request, or use such data in connection with transportation, logistics, delivery, and/or other related services, such as rewards partners for fuel discounts and similar discount programs, arranged or performed by Movelink. We may also share commercial drivers' names, vehicle license numbers, vehicle truck numbers, and location with other users or third parties such as operators of a receiving facility. We may also share their vehicle truck number and vehicle license number with third parties, such as a pickup facility. We may also share carriers' names with other users.

2. At users' request

This includes sharing data:

- With other users in connection with services or features that require data sharing.
- With third parties in connection with Movelink partnerships or promotions with those third parties. For example, if a user requests a service through a partnership or promotional offering made by a third party, Movelink may share certain data with those third parties. This may include, for example, other services, platforms, apps, or websites that integrate with our APIs; those with an API or service with which we integrate; or other Movelink business partners and their users in connection with promotions, contests, or specialized services. The handling of such data by those third parties is subject to their privacy notices, and users should refer to those notices for more information on the handling of their data.

3. With the general public

Questions or comments from users submitted through public forums, such as blogs and social media pages, may be viewable by the public, including any personal data included in the questions or comments submitted by a user, or other features of the services that are viewable by the general public.

4. With Movelink affiliates and third parties

We share data with Movelink affiliates to help us provide our services or conduct data processing on our behalf, or for data centralization and/or logistics purposes. We also share data with third parties with whom users choose to let us share data, for example other apps or websites that integrate with our API or services, or those with an API or service with which we integrate.

5. With Movelink service providers and business partners

Movelink provides data to vendors, consultants, marketing partners, research firms, and other service providers or business partners. These include:

- Payment processors and facilitators
- Cloud storage providers
- Marketing partners and marketing platform providers, including social media advertising services
- Data analytics providers
- Research partners, including those performing surveys or research projects in partnership with Movelink or on Movelink's behalf
- Vendors that assist Movelink to enhance the safety and security of its apps
- Consultants, lawyers, accountants, and other professional service providers

6. For legal reasons in the event of a dispute

Movelink may share users' personal data if we believe it's required by applicable law, regulation, operating license or agreement, legal process or governmental request, or where the disclosure is otherwise appropriate due to safety or similar concerns.

This includes sharing personal data with law enforcement officials, public health officials, other government authorities, or other third parties as necessary to enforce our [Terms and Conditions](#), user agreements, or other policies; to protect Movelink's rights or property or the rights, safety, or property of others; or in the event of a claim or dispute relating to the use of our services. In addition, where a user uses another person's credit card, we may be required by law to share that user's personal data with the owner of that credit card.

This also includes sharing personal data with others in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company.

7. Through social media sharing

The services may integrate with social media sharing features and other related tools, such as WhatsApp, which let users share actions they take on the services with other apps, sites, or media, and vice versa. Their use of such features enables the sharing of data with others, depending on the settings they establish with the social media sharing service. Please refer to the privacy notices of those social media sharing services for more information about how they handle the data provided to or shared through them.

8. With consent

Movelink may share a user's personal data other than as described in this notice, if we notify the user and they consent to the sharing.

E. Data retention and deletion

Movelink retains user data for as long as necessary for the purposes described above. Users may request deletion of their accounts at any time. Movelink may retain user data after a deletion request due to legal or regulatory requirements or for the reasons stated in this policy.

Movelink retains user data for as long as necessary for the purposes described above. This means that we retain different categories of data for different periods of time depending on the category of user to whom the data relates, the type of data, and the purposes for which we collected the data.

Users may request deletion of their account at any time by submitting a request [here](#). Following an account deletion request, Movelink deletes the user's account and data, unless they must be retained due to legal or regulatory requirements, for purposes of safety, security, and fraud prevention, or because of an issue relating to the user's account such as an outstanding credit or an unresolved claim or dispute.

F. Grounds for processing

We only collect and use personal data where we have lawful grounds to do so. These include processing user personal data to provide requested services and features, for purposes of Movelink's legitimate interests or those of other parties, to fulfil our legal obligations, or based on consent.

We collect and use personal data only where we have one or more lawful grounds for doing so. Such grounds may vary depending on where our users are located, but generally include processing personal data:

1. To provide requested services and features

In order to provide our services, we must collect and use certain personal data. This includes:

- User profile data, which we use to establish and maintain user accounts; verify user identity; communicate with users about their booked loads, trips, and accounts; and enable users to make payments or receive earnings
- Location data, which is used to track loads and assist with navigation
- Usage data, which is necessary to maintain, optimize, and enhance Movelink's services, including to determine incentives, connect loads and commercial drivers, and calculate payments
- User-provided contacts, including names and email addresses, which we use to enable users to request and receive quotations and services from their contacts
- Transaction information

- Information relating to customer support

2. For purposes of the legitimate interests of Movelink or other parties

This includes using personal data to maintain and enhance our users' safety and security. For example, we use personal data to prevent use of our services by users who have engaged in inappropriate or dangerous behavior, such as by retaining data of banned users to prevent their use of Movelink's apps.

This also includes purposes such as combating fraud; improving our services, direct marketing, machine learning, and research and development; and enforcing Movelink's [Terms and Conditions](#).

In addition, it includes using personal data to the extent necessary for the interests of other people or the general public, such as in connection with legal or insurance claims, and to protect the rights and safety of others.

3. To fulfill Movelink's legal obligations

Movelink is subject to the laws and regulations in the jurisdictions in which it operates that may require it to collect, process, retain, and disclose users' personal data. We collect and use personal data to comply with such laws.

Movelink may also share data with law enforcement regarding criminal acts or threats to public safety, or requests by third parties pursuant to legal processes.

4. With consent

Movelink may collect and use personal data based on the user's consent. For example, we may collect personal data through voluntary surveys.

Users may revoke such consent at any time. However, they will not be able to use any service or feature that requires collection or use of that personal data.

IV. Choice and transparency

Movelink enables users to access and control the data that it collects, including through:

- *In-app settings*
- *Device permissions*
- *Marketing opt-outs*

Movelink also enables users to request access to or copies of their data, changes or updates to their accounts, deletion of their accounts, or that Movelink restrict its processing of user personal data.

1. Device permissions

Most mobile device platforms (iOS, Android, etc.) have defined certain types of device data that apps cannot access without the device owner's permission, and these platforms have different methods for how that permission can be obtained. iOS devices notify users the first time the Movelink app requests permission to access certain types of data and gives users the option to grant or refuse permission. Android devices notify users of the permissions that the Movelink app seeks before their first use of the app, and use of the app constitutes a grant of such permission.

- Location data

We request permission for our app's collection of precise location from a user's device (whether their own device or otherwise) per the permission system used by their mobile operating system. If they initially permit the collection of this data, they can later disable it by changing the location settings on their mobile device. However, they may not be able to use the Movelink app if they disable our collection of precise location data. Additionally, disabling our collection of precise location from their device will not limit our ability to derive an approximate location from their IP address to personalize the content of the websites and/or app.

- Important information about device permissions

The permissions requested by the Movelink app include permission to collect users' location data for the purposes described above. This permission enables Movelink to collect this data when the Movelink app is running in the foreground (app open and on-screen) or background (app open but not on-screen) of their mobile device.

Carriers and commercial drivers cannot use the Movelink app if they do not permit location data collection.

Please take the following steps to disable the Movelink app's ability to collect precise location data:

On iOS

Settings → Privacy → Location Services → Movelink → choose Never

On Android

Settings → Apps → Movelink → scroll to Permission → toggle Location

On Android Lollipop (5.1) and earlier

Settings → Location → toggle Off

- Notifications: account and updates

Movelink provides users with notifications and updates related to activity on their account and booked loads. These notifications are a necessary part of using the Movelink app and cannot be disabled.

- Notifications: potential loads and news

Users may enable Movelink to send push notifications about potential loads and news from Movelink. Push notifications may be enabled or disabled through Settings on iOS or Android.

2. Marketing opt-outs

Users may opt out of receiving marketing emails and other messages from Movelink by following the unsubscribe instructions in those messages. We may still send opted-out users non-promotional communications, such as those about their account, services requested, or our ongoing business relations.

3. User data requests

Movelink provides users with a variety of ways to learn about, control, and submit requests, questions, and comments about Movelink's handling of their data. Users may submit these by [email to \[\]](#).

- Accessing data: Users can ask for an explanation of the data we collect from them and how we use it.
- Receiving data: Users can ask for a copy of data that Movelink has collected from them with their consent or as necessary to provide our services.
- Changing or updating data: Users can ask that Movelink change or update their data, including if they believe such data is inaccurate or incomplete.
- Deleting data: Users may request deletion of their account at any time by [emailing \[\]](#).
- Objections, restrictions, and complaints: Users may request that we stop using all or some of their personal data, or that we limit our use of their data. Movelink may continue to process data after such objection or request to the extent required or permitted by law.
- In addition, depending on their location, users may have the right to file a complaint relating to Movelink's handling of their personal data with the applicable data protection authority.

Questions, comments, or complaints about Movelink's data practices can be submitted [here](#).

V. Cookie Notice

We and our affiliates, third parties, and other partners use cookies and other identification technologies on our websites, mobile applications, email communications, advertisements, and other online services (collectively, the 'Online Services') for a number of purposes, including: authenticating users, remembering user preferences and settings, determining the popularity of content, delivering and measuring the effectiveness of advertising campaigns, analyzing site traffic and trends, and generally understanding the online behaviors and interests of people who interact with our Online Services.

1. Cookies and Related Technologies Overview

Cookies are small text files that are stored on your browser or device by websites, apps, online media, and advertisements that are used to remember your browser or device during and across website visits. We also utilize other technologies that may identify you or the devices you use. For example, 'pixel tags' (also called beacons) are small blocks of code installed on (or called by) a webpage, app, or advertisement which can retrieve certain information about your device and browser, including, for example: device type, operating system, browser type and version, website visited, time of visit, referring website, IP address, advertising identifiers, and other similar information, including the small text file (the cookie) that uniquely identifies the device. Pixels provide the means by which third parties can set and read browser cookies from a domain that they do not themselves operate and collect information about visitors to that domain, typically with the permission of the domain owner. 'Local storage' refers generally to other places on a browser or device where information can be stored by websites, ads, or third parties (such as HTML5 local storage and browser cache). 'Software Development Kits' (also called SDKs) function like pixels and cookies, but operate in the mobile app context where pixels and cookies cannot always function. The primary app developer can install pieces of code (the SDK) from partners in the app, and

thereby allow the partner to collect certain information about user interaction with the app and information about the user device and network information.

2. Personalized Advertising & Relevancy

In order to facilitate the most relevant ads possible, Movelink works with various service providers who assist us in delivering similar ads to end users across devices and platforms. For example, we work with social media advertising services to provide you with relevant ads based on your Movelink activity through their media channels. We may also use service providers to provide you with a similar ad on a mobile website or mobile application as with a traditional website ad. See below for more information on your choices to limit these types of advertising.

3. Your Choices

You have the right to choose whether or not to accept cookies. However, they are an important part of how our Online Services work, so you should be aware that if you choose to refuse or remove cookies, this could affect the availability and functionality of the Online Services.

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. To do so, please follow the instructions provided by your browser which are usually located within the 'Help' or 'Preferences' menu. Some third parties also provide the ability to refuse their cookies directly by clicking on an opt-out link, and we have indicated where this is possible in the table below.

For mobile users, you have controls in your device Operating System that enables you to choose whether to allow cookies, or share your advertising ID with companies like Movelink or our advertising service providers.

VI. Updates to this notice

We may occasionally update this notice. Use of our services after an update constitutes consent to the updated notice to the extent permitted by law.

We may occasionally update this notice. If we make significant changes, we will notify users in advance of the changes through the Movelink apps or through other means, such as email. We encourage users to periodically review this notice for the latest information on our privacy practices.

After such notice, use of our services will be understood as consent to the updates to the extent permitted by law.