

HubPro Privacy Policy

1. Corporate Commitment to Privacy

Hub Group, Inc. and its subsidiaries and affiliates (collectively “Hub” “our,” “we” or “us”) are committed to respecting your privacy. This Privacy Policy describes how we collect, use, disclose, share, store and otherwise process information when you use our HubPro mobile application (the “App”). Hub will only collect and use Personal Information via the App as it relates to business to business transactions as defined in the California Consumer Privacy Act (“CCPA”). Hub does not collect via the App personal information from consumers as that term is defined in the CCPA.

We urge you to read this Privacy Policy so that you understand our commitment to you and your privacy, and how you can participate in that commitment.

2. Definition of Personal Information

Personal Information is your user data that is personally identifying and sensitive in nature, which may include, without limitation, the following: name, device ID, and contact data (i.e. e-mail address and telephone number).

3. Definition of Non-Personal Information

We may also collect information that is related to you but that does not personally identify you and is not personal or sensitive in nature (“Non-personal Information”). Non-personal Information also includes information that could personally identify you in its original form, but that we have modified (for instance, by aggregating, anonymizing or de-identifying such information) in order to remove or hide any personally identifying information.

4. Scope and Consent

Hub has established and implemented this Privacy Policy to inform users of the App how we use and protect the information we collect from such App that relates to you. By installing our App, you consent to Hub’s collection, use, disclosure, sharing, transfer and storage of information obtained from the App relating to you.

5. Information Voluntarily Provided

Hub collects Personal Information about you in connection with the App. As part of installing our App on your device, you will register the App, and such registration may record some of your personal information, including, without limitation, name, email address, phone number, and device ID. Some of this information may be pre-populated into the registration by accessing information on your device’s SIM card. Registration information will be recorded and stored by Hub. You may also provide various other information through the App, which may include event notifications regarding loads moved on behalf of Hub, such as estimated time of arrival to locations, pickup notice, container weight, BOL information, pictures of paperwork, delivery notice, and other load related information.

6. Other Information

Hub may also collect information about you when the App tracks your device location. The App provides location information from time to time to Hub on your mobile device’s location through a GPS function.

The App may also gather information that does not, by itself, identify a specific individual but which could be used to indirectly identify you. Our servers automatically record this information, which may include your Internet Protocol ("IP") address, browser type, browser language, and the date and time of communications as well as other technical information about your mobile device, system, application software and peripherals. Gathering such information helps us ensure our App works correctly and supports our analytic efforts.

All information gathered from the App will be recorded and stored by Hub.

7. Permitted Uses of Personal Information and other information

Your Personal Information and any other information obtained by the App may be used by Hub at its discretion and shared with Hub's customers and vendors or any other third party to facilitate Hub's role as a transportation service provider. For instance, Hub will use your device's location information to inform its internal operations, customers and other third party vendors of your location in relation to the pickup, transport, and delivery of freight loads you are moving for Hub's customers. We may also utilize information collected from the App to protect the security and integrity of the App and to monitor, improve, fix, or otherwise modify the App, including, without limitation, using the information to comply with legal and/or regulatory requirements.

8. Disclosure of Personal Information to Third Parties

Hub will not rent or sell user information (including your Personal Information) to others but may disclose such information to third parties to facilitate Hub's provision of transportation services.

9. Disclosure of Personal Information for Business Purposes

If Hub sells or divests any part of its operations, Hub may transfer user information (including your Personal Information) in connection with the sale.

10. Disclosure of Personal Information for Legal and Safety Reasons

Hub may be required to disclose user data (including, for instance, Personal Information) to the authorities, law enforcement agencies, government agencies, or legal entities. We may disclose information by law, litigation, or as a matter of national security to comply with valid legal process including subpoenas, court orders or search warrants, and as otherwise authorized by law. We may also need to disclose user data in the event of an emergency that threatens an individual's life, health, or security.

11. Security Measures Taken to Protect Personal Information by Hub

Security of all information is of the utmost importance for Hub. Hub uses technical and physical safeguards to protect the security of your personal information from unauthorized disclosure. We also take reasonable precautions to ensure that only necessary people and third parties have access to user data (including, without limitation, Personal Information). Nevertheless, such security measures cannot prevent all loss, misuse or alteration of user data (including, without limitation, Personal Information) and we are not responsible for any damages or liabilities relating to any such incidents to the fullest extent permitted by law. Where required under law, we will notify you of any such loss, misuse or alteration of Personal Information that may affect you so that you can take the appropriate actions for

the due protection of your rights. Hub also reviews its security procedures periodically to consider appropriate new technology and updated methods.

12. Security Measures to Protect Personal Information by Third Parties

We require that our third party vendors agree to keep all confidential information we share with them and to use the information only to perform their obligations in the agreements we have in place with them. These third party vendors are expected to maintain privacy and security protections that are consistent with Hub's privacy and information security policies.

While we provide these third parties with no more information than is necessary to perform the function for which we engaged them, any information that you provide to these third parties independently is subject to their respective privacy policies and practices.

13. Data Retention and Storage

Hub retains user information for business purposes as long as Hub deems appropriate. Hub will also retain user information as reasonably necessary to comply with our legal obligations, resolve disputes and enforce our agreements. We may also retain cached or archived copies of user information for a reasonable period of time.

Unfortunately, however, no system or online transmission of data is completely secure. We cannot guarantee the security of information transmitted to or through the App. To that end, Hub will notify you of a data breach when Hub determines that is reasonably necessary in accordance with applicable law. Any transmission is at your own risk and Hub expects that you will use appropriate security measures to protect your information.

14. Choice: Your Privacy Rights

You acknowledge that you elect, at your sole discretion, to download and use the App. You are free to terminate use of the App and/or uninstall the App from your mobile device at any time. You also may disable the GPS location function of the App at your discretion by adjusting your device settings accordingly at any time and acknowledge that the GPS location function of the App may run in the foreground, background and, if not disabled by you, while the App is turned off (but still installed on your mobile device).

15. International Transfer of Personal Information

In addition, Hub may share user data within our family of companies for a variety of purposes. This may involve the transfer of personal data to other locations outside your home country to Hub offices, affiliates and subsidiaries in different locations around the world.

16. Inquiry, Complaint, and Dispute Process

You may contact Hub with any questions, concern, or inquiries about this Privacy Policy or user data. If you would like to make a formal complaint, please contact Hub Group, Inc. at 2001 Hub Group Way, Oak Brook, IL 60523, attn.: General Counsel or by email at legal@hubgroup.com. All complaints will be evaluated and a reply will be sent as soon as appropriate. In some instances, Hub may have to disable the App if necessary to satisfy your request.