

## Privacy Policy

UPDATED DATE: OCTOBER 28, 2020

Trasncosmos America, Inc., (“TRANSCOSMOS” or “www.transcosmos.com” or “we” or “us”) has created this privacy policy (this “Privacy Policy”) in order to demonstrate its commitment to user, visitor and customer privacy with regard to the TRANSCOSMOS web site at www.transcosmos.com (the “Website”). Privacy on the Website is of great importance to us. Because we gather important information from our users, visitors and customers (collectively “Customers” or “you” or “your”), we have established this Privacy Policy as a means to communicate our information gathering and dissemination practices. By accessing this Website, you acknowledge and agree to this Privacy Policy.

In compliance with the CA Consumer Privacy Act (CCPA), California residents have the right to:

- Request disclosure of your business’ data collection and sales practices in connection with the requesting consumer, including the categories of personal information you have collected, the source of the information, your use of the information and, if the information was disclosed or sold to third parties, the categories of personal information disclosed or sold to third parties and the categories of third parties to whom such information was disclosed or sold;
- Request a copy of the specific personal information collected about them during the 12 months before their request (together with the above, a “personal information request”);
- Have such information deleted (with exceptions);
- Request that their personal information not be sold to third parties, if applicable; and
- Not to be discriminated against because they exercised any of the new rights.

### Information We Collect & How We Make Use of It

We require Customers who use our Website (collectively, the “Service”) to give us personally identifiable information, which may include but is not limited to the Customer’s first and last name, company name, address, phone number, email address, cookies, IP logs, and other information (collectively “Personal Information”). Besides the Personal Information, we may also collect other information regarding your use of the Website, including general statistical or aggregate information, which may be collected whether or not you register for the Services offered on our Website. From time to time, we may also collect or ask for additional Personal Information, which will also be expressly included herein as Personal Information. You can opt-out of providing this additional information by not entering it when asked or not using the Website, although not providing it may hinder your ability to use the Website.

The categories of personal information we collect are:

- Identifiers (real name, contact information, email address, etc.) for contacting.
- Internet/electronic network activity information.

We use the Personal Information and the information that we collect to provide and maintain the Website as we deem appropriate in our sole discretion. We may also use the information to contact you to further discuss interest in our company, the services that we provide, and to send information regarding our company or partners, such as promotions and events. You may be invited to receive an email newsletter or other correspondence by providing an email address. We may also email (or send via other methods) information regarding updates to the Website or TRANSCOSMOS, and may send a customer newsletter, or other correspondence. You will have an opportunity to unsubscribe to any emails or mailings by clicking on an “unsubscribe” hyperlink contained in promotional emails we send you, or by e-mailing us at our Customer Service Department. Any opt-out by you is not deemed valid until processed by TRANSCOMOS. It is your obligation to verify that you have been opted-out. TRANSCOSMOS shall not be liable for problems with the opt-out procedures.

Except as we explicitly state at the time we request information, or as provided for herein, we do not disclose to third parties the information provided.

In addition, we may share or disclose your information, including Personal Information, in the following situations:

- We reserve the right to disclose any Personal Information or other information if required to do so by law, including compliance with legal process served on TRANSCOSMOS, or if we believe that such action is necessary in order to (a) protect or defend the legal rights or property of TRANSCOSMOS, the Website or its Customers, or (b) in an emergency to protect the health and safety of the Website’s users or the general public.

Personal Information you submit, and other information we collect, may be shared with our parent company, subsidiaries, affiliates, licensors, licensees, joint venturers, partners, sponsors and/or vendors (collectively, “Affiliated Third Parties”) to perform customer service, carry out your requests, respond to inquiries, and to notify you regarding any account information.

- Personal Information you submit, and other information we collect, will be disclosed as part of any merger or acquisition, creation of a separate business to provide the Website or fulfill our services, sale or pledge of company assets as well as in the event of an insolvency, bankruptcy or receivership in which Customer information would be transferred as one of the business assets of the company.
- Personal Information you submit, and other information we collect, may be distributed or shared in order to conduct any business as we, in our sole subjective discretion, deem reasonable.

We do not respond to browser do-not-track signals or mechanisms.

TRANSCOSMOS may also collect certain information from visitors to, and users of, the Website, such as Internet addresses. This information is logged to help diagnose technical problems, and to administer our Website in order to constantly improve the quality of the Service. We may also track and analyze non-identifying and aggregate usage and volume statistical information from you and provide such information to third parties.

TRANSCOSMOS does not wish to collect any Personal Information (or any information at all) from any persons under 14 years old. If you are under 14 years old, you may not use the Website.

We have in place the appropriate Data Processing Agreements (DPAs) with all vendors and sub-processors that process website data on our behalf. Check out the Sub-processor section below for more information on how we vet and contract with our sub-processors.

Important notes on sub-processors:

1. We have a diligence process to ensure that we only trust parties who have stringent standards regarding the safety and security of Personal Data.
2. We have in place Data Processing Agreements with all of our sub-processors.

Here is the list of our sub-processors:

Sub Processor	Purpose	GDPR-Compliant
Pipeline, Inc.	Sales & Marketing	Yes
Hubspot, Inc.	Sales & Marketing	Yes

### Anti-Spam Policy

TRANSCOSMOS.com subscribes to an Anti-Spam policy for all its communication protocols. This means that we do not condone unsolicited email messages, notifications, alerts or any message that you may receive from someone who should not have your email address.

If you have received an unsolicited email message, which you would like to report to TRANSCOSMOS please inform us via email at: [legal@transcosmos.com](mailto:legal@transcosmos.com).

The following two options are available:

- Inform TRANSCOSMOS of the incident, but keep your email unblocked, or
- Inform TRANSCOSMOS of the incident and have your email blocked so as to not be able to receive any messages sent via TRANSCOSMOS.

Please include your email address, the date and time you received it and the contents of the message (if possible) when completing the email.

### Third-Party Websites

The Website may contain links to other websites. We are not responsible for the privacy practices or the content of these other websites. You will need to check the policy statement of these websites to understand their policies. When you access a linked site you may be disclosing private information. It is your responsibility to keep such information private and confidential.

### Cookies

When you view our Websites, we may store some information on your computer's hard drive. This information will be in the form of a "Cookie." Most web browsers automatically accept Cookies, but you can change your browser to prevent that.

## Security

The Website makes a reasonable effort to protect your information by using Secure Sockets Layer (SSL) technology. SSL encrypts your information to ensure it remains private and secure. WE DO NOT REPRESENT, WARRANT AND/OR GUARANTEE THAT PERSONAL INFORMATION WILL REMAIN SECURE. To check the security of your connection, look at the bottom of your browser window after accessing the server. If you see an unbroken key or a closed lock (depending on your browser), then SSL is active. You can also check by looking at the URL line of your browser. When accessing a secure server, the first characters of the site will change from "http" to "https".

## Updates To Our Policy

If we make any material changes to this Privacy Policy, we will post a notice on this Website notifying users of the changes. In some cases, we also may send an email notifying users of the changes. You should check this Website periodically to see if any recent changes to this Privacy Policy have occurred. If you have any questions regarding this Privacy Policy, you should contact our Customer Service Department.

## How To Contact Us

If you have any questions regarding the TRANSCOSMOS privacy policy or information that you have submitted to us, please feel free to contact us at:

- Email: [legal@transcosmos.com](mailto:legal@transcosmos.com)
- Mailing Address: Transcosmos America, Inc. 879 W 190th Street, Suite 410, Gardena, CA 90248.

To submit "Do Not Sell My Information" requests, please contact us at:

- Toll-free at 310-630-0072
- Email: [legal@transcosmos.com](mailto:legal@transcosmos.com)

Please note:

- Consumers may only make a personal information request twice in a 12-month period.
- TRANSCOSMOS will need to collect information from the requesting party so that it can verify their identity.
- TRANSCOSMOS will respond within 45 days of receiving a personal information request.

California Residents:

To opt-out from sale under CCPA, please submit a Do Not Sell My Personal Information opt-out request.