



### Rate-Highway, Inc. Privacy Policy

Rate-Highway is dedicated to protecting your privacy and handling any sensitive or personal information we obtain from you with care and respect. This privacy policy explains how we collect, use, manage, share and protect business information. Please read this notice carefully to understand our information collection and management practices.

As used in this Privacy Policy, "Rate-Highway" refers to Rate-Highway, Inc., and is referred to in this Privacy Policy as "Rate-Highway" "we," "us," "our," and "ourselves."

When this Privacy Policy uses the term "sensitive or personally identifiable information," we mean information that identifies a particular individual or company. This may include such things as the company or individual's name, postal address, e-mail address, telephone number, social security or employer identification number or other information. When other information is directly associated with sensitive or personally identifiable information, this other information also is treated as sensitive or personally identifiable information for purposes of this Privacy Policy. Sensitive or personally identifiable information is sometimes referred to in this Privacy Policy as "sensitive or personal information." Finally, the terms of this Privacy Policy are subject to all applicable laws.

Sensitive or personally identifiable information does not include screen names (also known as member names, usernames or other online aliases) provided in the course of registering with or using any function of our websites, except in circumstances in which we request that visitors provide their e-mail addresses as their screen names. Sensitive or personally identifiable information also does not include information we collect through online and other public sources including websites and other electronic media. This information is not directly tied to other sensitive or personally identifiable information in our databases and is used to provide services and products to our customers.

Companies use Rate-Highway solutions to more effectively drive their business and enable businesses to collect and use competitive price and other information in their industry. Rate- Highway considers ourselves to be a steward of the sensitive or personal information we collect, manage and provide. It is our responsibility to safeguard the information within our care and we are committed to managing our data in a secure and responsible manner. We may also collect other types of identifying information such as payment or other information which may be associated with sensitive or personally identifiable information.

We may collect sensitive information when you register, log on, or visit our websites to participate in certain activities and when you provide information to our customer service representatives.

#### Typical Ways We Collect and Use Information

**Login information** – When you access Rate-Highway services via a browser, application or other client, our servers automatically record certain information. These server logs may include information such as your web request, your interaction with a service, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser or your account.

**User communications** – When you send email or other communications to Rate-Highway, we may retain those communications in order to process your inquiries, respond to your requests and improve our services.

**Technology** -We collect information through technology to make our sites more useful to you and for various purposes related to our business. For instance, when you come to one of our sites, we collect your IP address. An



IP address is associated with the access point through which you enter the Internet, and is typically controlled by your Internet Service Provider (ISP). Standing alone, your IP address is not sensitive or personally identifiable. We may use IP addresses to collect information regarding the frequency with which our visitors visit various parts of our sites, and we may combine IP addresses with sensitive or personally identifiable information.

Our websites collect information through a variety of technical methods, including cookies and web beacons. Cookies are pieces of information that a website sends to your computer while you are viewing the websites. Web beacons are small pieces of data that are embedded in images on the pages of websites. Cookies, web beacons and other technical methods may involve the transmission of information either directly to us or to a third party authorized by us to collect information on our behalf. We use this information to improve the quality of our service, including for storing user preferences, improving search results and tracking user trends, such as how people search.

Rate-Highway may use the information collected through these technical methods for many purposes, including delivering content, tracking and enhancing a visitor's experience on our websites. For example, when you return to one of our websites after logging in, cookies provide information to the sites so that the sites will remember who you are. We also may use technical methods to analyze the traffic patterns on our websites, such as the frequency with which users visit various parts of our websites. These technical methods may enable us to collect and use information in a form that is sensitive or personally identifiable.

We are committed to the following tenets:

**Notice:** We inform users and customers how we collect, use, manage and share information. Use &

**Disclosure:** We use and disclose data in accordance with defined policies that respect a business's and business professional's choice to restrict the marketing use of their contact information.

**Data Security:** We apply appropriate technical, physical and administrative data security measures to protect data against unauthorized access and disclosure.

**Accountability:** We seek to adhere to this Privacy Policy through ongoing compliance, training, documentation, assessment and dispute resolution initiatives.

Our approach to information management and data privacy enables us to adapt and respond to changes in the Internet environment while remaining committed to our principles. The free flow of information must be fairly balanced against privacy and data protection interests, and Rate- Highway is committed to employing such a balance.

Rate-Highway may use your sensitive or personally identifiable information in many ways. As outlined below, you may "opt-out" of certain uses of your sensitive or personal information. Before we use your information in a manner different than the purposes we've described, we will ask for your consent.

We may collect sensitive or personally identifiable information associated with certain customers or customers' clients, such as company Employer Identification Numbers or other corporate information, in order to provide certain product and service offerings. We will only collect this information if it is necessary to fulfill orders or verify accounts, we will only use it for the limited, permissible purpose for which it is collected and we will take commercially reasonable steps to adequately secure the information. For more information regarding our data security practices, please review the "Information Security" section below. We may also share this information with trusted third parties for the limited, permissible purpose of fulfilling the associated service.



Rate Highway may also use your sensitive or personal information for many purposes other than sending you materials. (We refer to all of these types of uses of your personal information that do not involve the sending of materials as "Operational Uses.") For example, we may use your information to complete transactions requested by you (such as your purchase of a service on our websites), or to send you administrative communications either about your account or about features of our websites, including any future changes to this Privacy Policy. Because these uses of your personal information do not involve sending you promotional materials your opting-out will not apply to any of these Operational Uses.

## **Information Security**

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where we store sensitive data.

We restrict access to sensitive information only to Rate-Highway employees, contractors and agents who need to know that information in order to process it on our behalf. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations. We require that our vendors likewise employ adequate data collection, processing, transfer, management and security measures in carrying out their services on our behalf.

There is no such thing as "guaranteed security", whether conducting business online or offline. Having established this fact, Rate-Highway employs commercially reasonable and appropriate data security safeguards that are consistent with our business operations and generally accepted industry standards

We commit ourselves to safeguarding our customers' data. We do this by:

- Establishing policies and procedures for securely managing information;
- Limiting employee access to sensitive information;
- Protecting against unauthorized access to customer data by using data encryption, authentication and virus detection technology, as required;
- Requiring service providers with whom we do business to comply with relevant privacy, legal and regulatory requirements;
- Monitoring our websites through recognized online privacy and security organizations;
- Conducting background checks on employees and providing training to our team members; and
- Continually assessing our Privacy Policy, information management and data security practices.

## **Companies with Whom Rate-Highway May Share Information**

Rate-Highway may hire companies to help provide products or services, like a shipping company that delivers a package or a merchant processing service ("Fulfillment Services"). In those instances, there is a need to share your information with these companies. Your opt-out choices will not apply to sharing by Rate-Highway of your sensitive or personal information with any of these companies. Nonetheless, except as separately permitted by other provisions of this Privacy Policy, these companies are allowed to gather, receive, and use your information only for the purposes described in this paragraph or to facilitate compliance with laws.

Rate-Highway shares information with third party service providers, such as credit card processors, auditors, attorneys, consultants and contractors, in order to support our websites and business operations. We



contractually require that these recipients only use the information for the intended purpose of the disclosure and that they destroy or return the information when it is no longer needed.

From time to time, we may purchase a business or sell one or more of our businesses (or portions thereof) and your sensitive or personally identifiable information may be transferred as a part of the purchase or sale. In the event that we purchase a business, the sensitive or personally identifiable information received with that business would be treated in accordance with this Privacy Policy, if it is practicable and permissible to do so. In the event that we sell a business, we will include provisions in the selling contract requiring the purchaser to treat your sensitive or personally identifiable information in the same manner required by this Privacy Policy (including any amendments to this Privacy Policy). In light of this protection, your opt-out choices will not affect our right to transfer your information to a purchaser in these circumstances.

### **Disclosures to Comply with Law and to Protect Security and Safety**

Regardless of any opt-out choices that you make, Rate-Highway will disclose sensitive or personal information when it believes in good faith that such disclosures (a) facilitate compliance with laws, including, for example, compliance with a court order or subpoena, or (b) will help to: enforce our Terms of Use or Rate-Monitor End User License Agreement; protect your safety or security, including the safety and security of property; and/or, protect the safety and security of our Websites, Rate-Highway, and/or third parties, including the safety and security of property belonging to Rate-Highway or third parties.

### **Opting-Out**

With regard to sensitive or personal information that you have provided under this Privacy Policy, an opt-out choice is available to you. The opt-out choice is the means by which you give us, or decline to give us, your consent to use your sensitive or personal information. Please note that opting out may limit or prohibit your use of some or all of the online features of the Rate-Highway websites and services. You can exercise your opt-out choice by logging into our Websites, and clicking on our Privacy Policy link and following the opt-out directions as described below.

You may choose to opt-out of receiving certain materials from Rate-Highway. For your convenience, when you make a choice regarding this opt-out, we will treat that choice as replacing any other choices regarding any opt-out that you may previously have made.

Please keep in mind that any opt-out choice you make will not apply in situations where (a) you either have made, simultaneously make, or later make a specific request for information from Rate-Highway, (b) Rate-Highway uses your sensitive or personal information for either "Operational Uses" or "Fulfillment Uses" (as described above) (c) you either have engaged, simultaneously engage, or later engage in transactions or (d) Rate-Highway shares your sensitive or personal information with respect to "Purchase or Sale of Businesses," or "Disclosures to Comply with Law and to Protect Security and Safety, Rate-Highway and Others." Also, any opt-out choice you make will not apply to sensitive or personal information that you provide about other persons, but these other persons will also have the opportunity to opt-out of receiving promotional materials.

It may take up to Ninety (90) days for your opt-out choice to be fully effective. Our systems require time to update, and mailings using your sensitive or personal information shared before your opt-out may already be in process. Finally, please keep in mind that, if you have not consistently used the same postal and email addresses on our websites, or if you have used a general change of address process (such as the change of address process offered by the U.S. Post Office) after providing address information on our websites, systems maintained Rate-Highway may have varying contact information for you. Accordingly, it may not always be Confidential



possible to match your new opt-out choice with your sensitive or personal information that you previously provided.

The security and confidentiality of your information is extremely important to us. We have implemented technical, administrative, and physical security measures to protect your information from unauthorized access and improper use. From time to time, we review our security procedures in order to consider appropriate new technology and methods. Please be aware though that, despite our best efforts, no security measures are perfect or impenetrable.

### **A Special Note about Children**

Children are not eligible to use Rate-Highway's websites and services, and we ask that minors not submit any sensitive or personal information to us. If you are a minor, you may not use this website or service.

### **Changes to Rate-Highway's Privacy Policy**

If we make material changes to our information management and Privacy Policies, we will post these changes on our websites in order to keep you informed of how we collect, use, manage, disclose and protect our information assets. Such changes will be posted in this section of our online privacy notice and the policy effective date will be updated accordingly.

### **Use of Our Websites Is Consent**

By using our websites, you hereby consent to our collection, use, management, retention and disclosure of your information as described in this notice.

You can access and update the contact information you gave us during registration (that is, your postal address, e-mail address, or any other information that would directly enable us to contact you) by going to our member services center. If you need to recover your password, you can also contact us via e-mail at [support@ratehighway.com](mailto:support@ratehighway.com).

Please include information in the e-mail that will help us identify your account so we can assist you with your request. We may also provide you an opportunity to update your contact information and/or modify your opt-out choice by sending you an e-mail or other communication that invites your response. Finally, you may unsubscribe from certain e-mail communications by clicking on unsubscribe links in those e-mails.

In some cases, your account may expire or be terminated under our Terms of Use. If so, you may contact member services at the address below to update your information and opt-out choice (to the extent that we still retain them).

If you have questions or wish to send us comments about this Privacy Policy, please send an e-mail with your questions or comments to [support@RateHighway.com](mailto:support@RateHighway.com) or write us:

Rate-Highway, Inc., 1900 Quail Street, Newport Beach, California 92660

### **CALIFORNIA PRIVACY RIGHTS**

California Civil Code Section 1798.83 permits customers of Rate-Highway who are California residents to request certain information regarding its disclosure of personal information to third parties for their direct marketing



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purposes. To make such a request, please send an e-mail to [support@ratehighway.com](mailto:support@ratehighway.com) or write us at Rate-Highway, Inc., 1900 Quail Street, Newport Beach, California 92660.

For more information regarding this privacy policy, please contact:

Rate-Highway, Inc., 1900 Quail Street, Newport Beach, California 92660

Privacy Policy Effective Date: September 23, 2011