

Final Privacy Policy

Privacy Policy

Effective Date: March 22, 2023

Kalgi Logistics Group, Inc. ("Kalgi", "the Company," "we," "us," or "our") is committed to privacy and data protection. This Privacy Policy applies to personal information the Company collects from you, through our interactions with you, through websites under the control of the Company that link to this Privacy Policy, and our services (collectively "Services"), as well as how we use and protect personal information.

All references to the Company include only Kalgi located at 1754 Technology Drive, Suite 200, San Jose, CA 95110.

YOUR PRIVACY IS IMPORTANT TO US. PLEASE READ THIS PRIVACY POLICY TO LEARN ABOUT THE INFORMATION THAT THE COMPANY COLLECTS FROM YOU AND HOW THE COMPANY USES THAT INFORMATION.

BY USING THE SERVICES YOU CONSENT TO THE COLLECTION, USE AND TRANSFER OF PERSONAL INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY, THEN PLEASE DO NOT USE THE SERVICES.

1. SCOPE

Please be advised that this Privacy Policy is not applicable to any Third Party Services, including but not limited to third-party applications or software that are integrated with our Services, or any other third-party products, services, or businesses (collectively, "Third Party Services"). Third Party Services are subject to their own privacy policies, which we recommend you review before using them.

Additionally, please note that this Privacy Policy does not apply to any service that does not explicitly display, reference, or link to this Privacy Policy. We strongly urge you to carefully review both the applicable Terms of Use and any additional terms and conditions, including those set forth under any commercial contract for Services with the Company, relating to any Services you acquire ("Additional Terms"). It is important to note that if any Additional Term conflicts with any provision in this Privacy Policy, the Additional Terms shall prevail for the Services to which they apply.

2. INFORMATION WE COLLECT

The Company collects various types of data to provide and improve the Services we offer. We collect some of this data directly from you when you interact with us, such as when you submit an inquiry or purchase a service from us. We also collect data through your interactions with our Services using technologies like cookies, error reports, and usage data. Additionally, we may supplement the data we collect by purchasing demographic data from other companies and using services from other companies to help us determine your location.

Below are some examples of the Personal Information and Sensitive Personal Information we may collect through our Services:

- **Identifiers**, such as your real name, postal address, email address, account name, or other similar identifiers.
- **Individual Records.** Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as name, signature, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. *Individual Records may include the following Sensitive Personal Information:* government identifiers (such as social security, driver's license, state identification card, or passport number) (Cal. Civ. Code § 1798.80(e)(1)), complete account access credentials (such as user names, account numbers, or card numbers combined with required access/security code or password) (Cal. Civ. Code § 1798.80(e)(2)), or mail, email, or text messages contents not directed to us (Cal. Civ. Code § 1798.80(e)(3)).
- **Commercial information**, such as records of personal property, products or Services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

- **Internet or other similar network activity**, such as browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
- **Geolocation data**, such as physical location or movements. Sensitive Personal Information included in Geolocation data may include precise geolocation.
- **Inferences drawn from other personal information**, such as a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Please note that this list is not exhaustive and may be updated from time to time as we expand our Services or as data collection practices change. It is important to us that you understand what information we collect and why we collect it. If you have any questions or concerns, please contact us.

3. HOW WE USE INFORMATION

We will only process personal information in accordance with applicable law. We will only process personal information for the purposes for which it was collected, unless we reasonably consider that we need to process it for another reason that is compatible with the original purpose.

Please note that we may process personal information about you without your knowledge or consent, in compliance with applicable law, where this is required or permitted by law.

The Company uses personal information that we collect from customers and visitors for the following purposes:

- Providing our Services;
- Providing ongoing support;
- Communicating with you, including promotional communications and customer relationship management ("CRM");
- Providing information about other Services;
- Helping us run our company, for example to improve our Services or our security, train staff or perform marketing activities, including CRM;
- Complying with our legal obligations; and
- Accounting and other administrative purposes.

The following are examples of how we use information:

Providing Services: We use personal information, including email, name, job title, company, and address, to carry out transactions and provide services. Additional information, such as contact information and credentials, may be collected during registration to diagnose and address problems and provide tailored services.

Improving Products and Services: By collecting data throughout customer interactions, we gain insights into usage patterns and needs. This helps us improve our services, add new features, and enhance customer experience.

Service Communications: We use collected data to deliver personalized communications, such as notifications of changes in information, updates to services, or privacy policies.

Content: We may collect feedback or questions from customers to provide necessary services. Phone conversations or chat sessions with representatives may be monitored and recorded to improve services and facilitate customer requests or complaints.

Marketing and Event Communication: Personal information is used to deliver marketing and event communications through various platforms. Customers can opt out of receiving marketing emails by following instructions provided in the emails.

Processing Payments: Payment information and required information are collected when customers make a payment. Third-party payment processors are used to securely process payment information. Credit card information provided through services is encrypted and transmitted directly to payment processors, and is not stored by the company. Customers can learn more about payment processors' storage and use of payment information by accessing their privacy policies.

4. HOW WE SHARE INFORMATION

The Company and its subsidiaries are committed to safeguarding the personal information of our users both online and offline. Access to your personal information is restricted to those employees, agents, contractors, or subcontractors of the Company who have a valid reason to access such information to provide the Services you have authorized or requested or for any other purposes described in this Privacy Policy. We do not sell or rent your personal information to third parties.

We may disclose personal information to the following:

- Company-controlled affiliates and subsidiaries located within and outside your region or country;

- Outsourced service providers who perform functions on our behalf located within and outside your region or country. For example, we may share payment data with banks and entities that process payment transactions or provide other financial services for fraud prevention and credit risk reduction;
- Authorized agents and representatives located within and outside your region or country who sell products or provide services on our behalf;
- Individuals authorized by you to receive your personal information; and
- Individuals to whom we are required by law to disclose personal information upon valid and enforceable request.

In the event that the Company or one of its affiliates is involved in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy, or other change of ownership or control (in whole or in part), we may share personal information. The Company requires that the shared personal information remain subject to the promises made in the then-current Privacy Policy unless and until you agree to a new privacy policy.

We may access, disclose, and retain your personal information if we have a good faith belief that doing so is necessary to:

- Comply with applicable laws or respond to valid legal processes, including from law enforcement or other government agencies, upon valid and enforceable request;
- Operate and maintain the security of our Services, including to prevent or stop an attack on our computer systems or networks.

Please note that some of our Services may direct you to services of third parties with different privacy practices from the Company's. If you provide personal information to any of these services, your data will be governed by their privacy statements or policies. The Company and its affiliates are not responsible for the privacy practices of these websites. Please review the privacy policies for these websites to understand how they process your information.

ADVERTISING: We may use third-party service providers ("Advertisers") to serve advertisements or collect data on our behalf across the internet and on the Services. Some Advertisers may collect personal information about your Service visits and interactions with our services to tailor marketing messages on the Service or other sites or to customize the Services. Advertisers may use cookies and other technologies to collect personal information, measure the effectiveness of their advertisements, and personalize advertisements on the Services. Advertisers may be able to use information from your Service visits to send marketing messages to you in a way that could personally identify you. The information collected by Advertisers may include your IP address, email addresses, and other user and device level information. Advertisers may also collect personal information that you share on the Services via a web form automatically and prior to your submission of the personal information (i.e., before you click "Submit"). When Advertisers send advertisements and links that appear on the Service directly to your browser, they automatically receive your IP address. Please note that your browser settings may not allow you to control Advertisers' technologies, and this Privacy Policy does not apply to, and we cannot control, the activities of Advertisers. If you would like more information about Advertisers' practices, please see <http://optout.aboutads.info/#!/>.

Opting out of receiving personalized ads from third-party advertisers and ad networks who are members of the Network Advertising Initiative (NAI) or who follow the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising (DAA) is generally possible by visiting the opt-out pages on the NAI website (<http://optout.networkadvertising.org>) and DAA website (<http://www.aboutads.info/choices/>).

Regarding your marketing preferences, if you have provided us with your contact information, we may, subject to any applicable Spam Act or similar regulation, contact you via e-mail, postal mail, or telephone about the Company's products, services, and events that may be of interest to you, including our newsletter.

You may generally unsubscribe from receiving future e-mails or change your contact preferences by using the unsubscribe link provided in e-mail communications you receive from the Company. Please note, however, that even if you choose to opt-out of receiving marketing emails, we may still need to send you important Service information related to your accounts and subscriptions.

If you wish to make changes to your account and marketing preferences, you can do so by contacting us through our "Contact Us" page.

5. HANDLING OF PERSONAL INFORMATION

Security of Personal Information

The Company places paramount importance on safeguarding the security of personal information. To this end, depending on the circumstances, we may hold your information in hard copy and/or electronic form. We implement various technologies and procedures to protect personal information and regularly review and update our strategies to meet our business needs, changes in technology, and regulatory requirements.

These measures comprise technical and organizational security policies and procedures, security controls, and employee training, among other things.

You are responsible for ensuring the security of your account credentials for the Services. The Company will regard access to the Services through your account credentials as authorized by you. Unauthorized access to password-protected or secure areas is strictly prohibited and may lead to criminal prosecution. We may suspend your use of all or part of the Services without notice if we suspect or detect any breach of security. If you believe that information you provided to us is no longer secure, please notify us immediately using our contact information.

In the event of a breach that affects the security of personal information about you, we will provide you with notice as required by applicable law. To the extent permissible under applicable law, the Company will provide any such notice that it must provide to you at your account's email address. By using the Services, you agree to receive notice electronically.

Storage and Transfer of Personal Information

Personal information collected by the Company may be stored and processed in your region, the United States, or any other country where the Company, its affiliates, or contractors maintain facilities. We take steps to ensure that the data we collect under this Privacy Policy is processed pursuant to its terms and the requirements of applicable law, wherever the data is located.

The Company also collaborates with third parties such as cloud hosting services and suppliers to meet the needs of our business, workforce, and customers. In some instances, we may need to disclose or transfer personal information within the Company or to third parties. When we do so, we take measures to ensure that personal information is processed, secured, and transferred in accordance with applicable law.

Retention of Personal Information

The Company retains personal information for as long as necessary to provide the Services and fulfill the transactions you have requested, or for other business purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. We are obligated by law to retain certain types of information for specified periods (e.g., statute of limitations). If personal information is no longer required for the legal or business purposes for which it was processed, we will usually destroy or anonymize that information.

6. ACCESSING AND UPDATING PERSONAL INFORMATION

You have the right to access, correct, or delete personal information we hold about you, subject to certain exceptions and limitations as provided by applicable law. We may require proof of your identity before fulfilling any such requests. We will make good faith efforts to resolve requests to correct inaccurate information except where the request is unreasonable, requires disproportionate technical effort or expense, jeopardizes the privacy of others, or would be impractical.

Residents of some jurisdictions may have additional rights concerning personal information. For example, California residents have the right to request certain information regarding the disclosure of their personal information to third parties for direct marketing purposes under California Civil Code Section 1798.83, also known as the "Shine the Light" law. If you are a California resident and you wish to make such a request, please contact us with "California Privacy Rights" in the subject line.

Please note that in certain circumstances, we may need to retain some personal information for longer periods of time as required or permitted by applicable law, such as to comply with our legal obligations, resolve disputes, and enforce our agreements.

For more information on your rights and options regarding your personal information, please refer to Section 9 – "Additional State Rights and Disclosures for California Residents (Your California Privacy Rights)" and any other applicable laws.

7. COOKIES & SIMILAR TECHNOLOGIES

The Company uses cookies and similar technologies ("Cookies") to enhance the performance and functionality of our websites and services, to understand how you use our websites and services, and to provide a better online experience to our visitors and users. This Cookies Policy explains how we use Cookies and how you can control them.

[How We Use Cookies](#)

We use Cookies to collect information about your use of our websites, including information about your device, your IP address, the pages you visit on our websites, and the actions you take while using our websites. We use this information to improve the performance and functionality of our websites, to personalize your experience on our websites, and to deliver marketing communications that may be of interest to you.

We may also use Cookies to collect personal information that you voluntarily provide to us through our websites, such as your name and email address, in order to send you marketing communications or to provide you with additional services. We may combine this personal information with other information that we have collected from you to improve our websites and services.

Types of Cookies

We use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your device until you delete them). The Cookies we use on our websites can be grouped into the following categories:

- **Strictly Necessary:** These Cookies are essential for the proper functioning of the websites, including any necessary authentication and authorization cookies.
- **Functionality:** These Cookies enable technical performance and allow us to remember the choices you make while browsing our websites, including any preferences you set.
- **Performance/Analytical:** These Cookies allow us to collect certain information about how you navigate the websites or utilize the Services or products running on your device. They help us understand which areas you use and what we can do to improve them.
- **Targeting:** These Cookies are used to deliver relevant information related to our websites to an identified machine or other device (not a named or otherwise identifiable person) which has previously been used to visit our websites. Some of these types of Cookies on our websites are operated by third parties with our permission and are used to identify advertising sources that are effectively driving customers to our websites.

Cookies Set by Third Party Services

In order to provide our users with a better online experience and to enhance our content, we may embed images and videos from third-party websites such as Facebook, LinkedIn, and Twitter. It is possible that you may receive cookies from these third-party websites. Please be advised that we do not have control over these cookies. The privacy practices of these third parties are governed by their own privacy statements or policies. We cannot be held responsible for the security or privacy of any information collected by these third parties through the use of cookies or other means. We recommend that you review the relevant third-party privacy statement or policy for information on how these cookies are used and how you can control them.

We also use Google Analytics, a third-party analytics provider, to collect information about website usage and users, including demographic and interest-level information. Google uses cookies to collect this information, including information about the pages users enter and exit on our website, what pages they view, time spent, browser, operating system, and IP address. Cookies allow Google to recognize a user when they visit our website or other websites. Google uses the information it collects to share with us and other website operators information about users, including age range, gender, geographic regions, general interests, and details about devices used to visit websites and purchase items. We do not link the information we receive from Google with any personally identifiable information. For more information regarding Google's use of cookies, and collection and use of information, please refer to the Google Privacy Policy (available at <https://policies.google.com/privacy?hl=en>). If you wish to opt-out of Google Analytics tracking, please visit the Google Analytics Opt-out Browser Add-on (available at <https://tools.google.com/dlpage/gaoptout>).

Other Similar Technologies

In addition to standard cookies and web beacons, our services can also use other similar technologies to store and read data files on your computer. This is typically done to maintain your preferences or to improve speed and performance by storing certain files locally. Company web pages may use web beacons to facilitate the delivery of cookies on our websites and track the number of users who have visited those websites. We may also include web beacons in our promotional email messages or newsletters to determine whether you have opened and acted upon them, as well as for statistical purposes.

How to Control and Delete Cookies

You have the ability to control, block, or restrict cookies through your web browser settings. Instructions on how to do this can be found within the Help section of your browser. Please note that cookies are specific to each browser. Therefore, if you use multiple browsers or devices to access our websites, you will need to manage your cookie preferences across each environment.

If you are accessing our websites through a mobile device, you will need to refer to your instruction manual or other help/settings resource to learn how you can control cookies on your device.

It is important to note that if you restrict, disable, or block any or all cookies from your web browser or mobile device, our websites may not operate properly, and you may not have access to our services or materials available through the websites. The Company shall not be liable for any difficulty using the websites or degraded functioning thereof caused by your settings and choices regarding cookies.

To learn more about cookies and web beacons, please visit www.allaboutcookies.org.

Do Not Track: Some web browsers, including Safari, Internet Explorer, Firefox, and Chrome, incorporate a "Do Not Track" ("DNT") or similar feature that signals to websites that a user does not want to have their online activity and behavior tracked. If a website that responds to a particular DNT signal receives the DNT signal, the browser can block that website from collecting certain information about the browser's user. However, not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, many website operators, including the Company, do not respond to DNT signals.

8. CHILDREN'S PRIVACY

SERVICES ARE NOT INTENDED FOR CHILDREN

Our Services are not intended for use by individuals under the age of majority in their place of residence. We do not knowingly collect or solicit personal information from children under the age of 13. If we become aware that we have collected personal information from a child under the age of 13 without verifiable parental consent, we will take steps to promptly delete the information from our servers. If you believe that we may have collected personal information from a child under the age of 13, please contact us immediately at [insert contact information].

In compliance with the U.S. Children’s Online Privacy Protection Act, if we learn that we have received personal information directly from a child under age 13 without his or her parent’s verified consent, we will use that information only to inform the child (or his or her parent or legal guardian) that he or she cannot use the Services.

California Minors: While our Services are not intended for anyone under the age of 18, if you are a California resident who is under age 18 and you are unable to remove publicly-available content that you have submitted to us, you may request removal by contacting us at [insert contact information]. When making a removal request, you must provide us with specific information, such as the URL for each page where the information was entered, so that we can find it. However, please note that we are not required to remove any content or information that: (1) federal or state law requires us or a third party to maintain; (2) was not posted by you; (3) is anonymized so that you cannot be identified; (4) you do not follow our instructions for removing or requesting removal; or (5) you received compensation or other consideration for providing the content or information. Please also note that the removal of your content or information from our Services does not ensure complete or comprehensive removal of that content or information from our systems or the systems of our service providers. Our obligations under California law are satisfied so long as we anonymize the content or information or render it invisible to other users and the public.

9. ADDITIONAL STATE RIGHTS AND DISCLOSURES FOR CALIFORNIA RESIDENTS (YOUR CALIFORNIA PRIVACY RIGHTS)

The following section applies to individuals who reside in California and other jurisdictions that provide additional privacy rights.

Data Collection – Right to Know

In the last twelve (12) months, we may have collected the categories of personal information as described in Section 2 - “Information We Collect” above. California residents have the right to request that we disclose certain information about our data collection and processing practices, including:

- The categories of personal information we have collected about you.
- The categories of sources from which we collected the personal information.
- The categories of third parties with whom we share the personal information.
- The specific pieces of personal information we have collected about you.

To make a request for this information, please contact us using the information provided in Section 11.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the business purposes indicated in Section 3 – “How We Use Information” above. We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

As a part of conducting our business operations, we may need to disclose personal information to third parties. Such disclosures are made in accordance with applicable laws, regulations, and contractual obligations. When we disclose personal information for a business purpose, we ensure that the recipient enters into a contract with us that describes the purpose of the disclosure and requires the recipient to maintain the confidentiality of the personal information and to not use it for any purpose other than performing the contract.

In accordance with Section 1798.115(c) of the California Consumer Privacy Act (CCPA), we share personal information with the categories of third parties listed in Section 4 – “How We Share Information” of our privacy policy, which can be found on our website [insert website link].

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose, as defined in the CCPA:

- Identifiers (such as name, address, email address, and phone number)
- Individual records (such as name, signature, social security number, driver’s license or state identification card number, insurance policy number, and bank account number)
- Commercial information (such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)
- Internet or other similar network activity (such as browsing history, search history, and information regarding a consumer’s interaction with an internet website, application, or advertisement)
- Geolocation data (such as the physical location or movements of a consumer)

- Inferences drawn from other personal information (such as a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes)

We do not sell personal information. In the event that we sell any personal information, we will update this Privacy Policy to list the categories of consumers' personal information sold, as required by the CCPA.

Your Rights and Choices

Under certain state laws, including the California Consumer Privacy Act (CCPA)/California Privacy Rights Act (CPRRA), residents may have additional specific rights regarding their personal information beyond those mentioned above. This section outlines these rights and provides instructions on how to exercise them.

Right to Access and Data Portability. You have the right to request that we disclose certain information to you about our collection and use of personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources from which we collected the personal information.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also known as a data portability request).
- If we disclosed personal information for a business purpose, the business purpose for which the personal information was disclosed, and the personal information categories that each category of recipient obtained.

Right to Correct Information. You have the right to request that we correct any incorrect personal information about you in our systems.

Right to Delete. You have the right to request that we delete any personal information about you that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) the personal information from our records, unless an exception applies.

Right to Opt-out of Sharing Personal Information for Cross-Contextual Behavioral Advertising. We do not share personal information for cross-contextual behavioral advertising.

Right to Limit Sensitive Personal Information Use. You have the right to limit the use of sensitive personal information regarding you.

Non-Discrimination. We will not discriminate against you for exercising any of your rights.

Exercising Your Rights

To exercise the access, data portability, and deletion rights described above, please contact us with the headline "Verifiable Consumer Request". Please note that this only applies to residents of certain states in the US. Please be prepared to provide:

- Name and contact information
- Proof of identity
- Information regarding requests made by an authorized agent on a resident's behalf
- Details regarding the request
- Signed acknowledgment of your request

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf may make a verifiable consumer request related to personal information about you. You may also make a verifiable consumer request on behalf of your minor child.

You may only make such a request for access or data portability twice within a 12-month period. The verifiable consumer request must provide enough information that allows us to reasonably verify that you are the person about whom we collected personal information or an authorized representative, and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm that the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

As a company, we take your privacy seriously and strive to be transparent in our handling of your personal information. When you submit a verifiable consumer request to us, we aim to respond within forty-five (45) days of its receipt. In the event that we require more time to respond (up to 90 days) we will inform you of the reason and the