

## Hub Group, Inc. Personal Information Privacy Policy

### 1. Corporate Commitment to Privacy

Hub Group, Inc. and its subsidiaries and affiliates (collectively “Hub”) are committed to respecting your privacy. This Privacy Policy describes how we collect, use, disclose, store and otherwise process your personal information when you use our websites and other products and services. Outside of the hiring process, Hub will only collect and use Personal Information as it relates to business to business transactions as defined in the California Consumer Privacy Act (“CCPA”). Hub does not collect 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” means any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his or her physical, physiological, mental, economic, cultural or social identity. Personal Information may include the following: name, address, date of birth, gender and contact data (i.e. e-mail address, telephone number and employer name). “Sensitive Personal Information” means personal information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information pertaining to the sex life of the individual.

### 3. Definition of Non-Personal Information

We may also collect information that is related to you but that does not personally identify you (“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 Personal Information.

### 4. Scope

Hub has established and implemented this Privacy Policy to inform visitors of the website and users of our services and how we use and protect the personal information we may collect from our websites and services.

### 5. Consent

Hub collects Personal Information about you in connection with many of our services. When working or using our company, you may be prompted to make an account which may hold personal information such as your name, mailing address, email address, or credit card information. When contacting our company, you may be required to submit contact information. When communicating with Hub, all communications will be transmitted and stored by us. By visiting our website or using any of our services or providing us with information, you consent to Hub’s collection, use, disclosure, transfer and storage of information relating to you as set forth in this Privacy Policy.

### 6. Information Collected Automatically

Hub may also collect Technical Information about you when you visit our websites or applications, which your web browser automatically sends whenever you visit a website on the Internet. “Technical

Information" is 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, but is not limited to, your Internet Protocol ("IP") address, browser type, browser language, and the date and time of your request. Gathering your information helps us ensure our websites and other services work correctly and support our customer analytic efforts. When you download or use our mobile-device applications, or access one of our mobile-optimized websites, we may receive information about your mobile device, including a unique identifier for your device.

We may collect information about your use of the websites through cookies and similar technology. A "cookie" is a unique numeric code that we transfer to your computer so that we can keep track of your interests and/or preferences and recognize you as a return visitor to the websites. For example, we may use these technologies to collect information about the ways visitors use our websites, to support the features and functionality of our websites, and to personalize your experience when you use our websites.

Log files may record website activity on our services and enable us to gather statistics about our users' browsing habits. These entries help Hub determine (among other things) how many and how often users have accessed or used our services, which pages they've visited, and other similar data.

Clear GIFs, sometimes called "web bugs" or "web beacons," are small electronic images that are placed on a web page or in an email message. We might use clear GIFs to monitor user behavior, deliver cookies, collect information, count visits, understand usage and campaign effectiveness, and to tell if a recipient has opened and acted upon an email.

## **7. Permitted Use of Personal Information**

Hub uses your Personal Information to provide you products and services, such as to fulfill your requests for products/services or to help us personalize our offerings to you and for other legally permissible purposes. We also use your Personal Information to support our business functions, such as fraud prevention, marketing, and legal functions. To do this, we combine personal and non-personal information, collected online and offline, including information from third party sources. Examples of some uses might be to protect the security and integrity of our websites, mobile services, and our business or to comply with legal and/or regulatory requirements.

In connection with a job application or inquiry, you may provide us with data about yourself, including your educational background or resume and other information, including your ethnicity where required or permitted by law. We may use this information throughout Hub, its subsidiaries and affiliates, and its joint ventures for the purpose of employment consideration and other legal purposes.

## **8. Disclosure of Personal Information to Third Parties**

Hub will not rent or sell your Personal Information to others but may disclose personal information with third-party vendors and service providers that work with Hub. We will only share Personal Information to these vendors and service providers to help us provide a product or service to you or for other lawful purposes. Examples of third parties we work with are call center operators, shippers, carriers, information processors and financial institutions. These third parties only have access to Personal Information necessary for them to complete their service to Hub. Also, if Hub sells any part of its operations, Hub may transfer Personal Information in connection with the sale.

**9. Disclosure of Personal Information for Legal and Safety Reasons**

Hub may be required to disclose 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 Personal Information in the event of an emergency that threatens an individual's life, health, or security.

**10. Disclosure of Personal Information Via Links to Third-Party Websites, Services, and Applications**

Using our website or services may link to third party web websites, services, and applications. Hub is not responsible for any Personal Information collected through these means. Information collected is governed through the third party's website's privacy policy. Any interactions you have with these web websites, services, or applications are beyond the control of Hub. When you post information to or through such services, those websites' privacy policies and cookie usage policies apply directly. We urge you to read the privacy and security policies of any external websites before providing any personal information while accessing those websites.

**11. Use of Cookies and Other Technologies (e.g. Web Beacons)**

Hub uses cookies to operate and improve our website as well as to simplify the interaction with you. When you visit our websites, our servers may send a cookie to your computer or mobile device to help personalize your experience and advertisements. Cookies help us better understand user behavior and facilitate effectiveness of advertisements. Cookies only stand to recognize your web browser but information collected from cookies is not personally identifiable. Hub may also use web beacons or other technologies in conjunction with cookies to gather information about your visit to our websites. Web beacons may be embedded through our website or electronic communications and can allow servers to collect information related to your visit. Web beacons are primarily used to provide content and advertisements that are more relevant to you.

**12. Ability to Disable Technologies**

Some web browsers (including some mobile web browsers) provide settings that allow you to control or reject cookies or to alert you when a cookie is placed on your computer, tablet or mobile device. Although you are not required to accept cookies, if you block or reject them, you may not have access to all features available through our services. For more information, visit the help page for your web browser or see <http://www.allaboutcookies.org>

**13. Security Measures Taken to Protect Information by Company**

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 use reasonable safeguards to keep all information secure. We also make all attempts to ensure that only necessary people and third parties have access to Personal Information. Nevertheless, such security measures cannot prevent all loss, misuse or alteration of 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.

#### **14. Security Measures to Protect Personal Information by Third Parties**

We require that our third party service providers and channel partners agree to keep all information we share with them confidential and to use the information only to perform their obligations in the agreements we have in place with them. These third party service providers and channel partners are expected to maintain privacy and security protections that are consistent with reasonable industry standards under the circumstances.

#### **15. Data Retention and Storage**

Hub retains your information for business purposes, for as long as it deems reasonably necessary. Hub will also retain your 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 your 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 our services. To that end, Hub will notify users 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.

#### **16. Mobile Services**

Some of our mobile services use your device's location information. You can adjust the settings of your mobile device at any time to control whether your device communicates this location information. We may also offer additional controls on our use of your mobile location information.

#### **17. Correction of Personal Information**

Hub will attempt to answer all requests that we correct the data if it is inaccurate or delete it as long as Hub is not required to retain it by law or for legitimate business purposes. In some jurisdictions, in addition to you agreeing to this Privacy Policy, data privacy laws may require us to obtain a separate consent before we send you information that you have not specifically requested. In certain circumstances, your consent may be implied (e.g. where communications are required in order to fulfill your requests and/or where you have volunteered information for use by us). In other cases, we may seek your consent expressly in accordance with applicable laws (e.g. where the information collected is regarded to be Sensitive Personal Information under local regulations). In addition, to protect your privacy, we will require you to prove your identity before granting access to, or agreeing to update, correct or delete your Personal Information and we will only implement requests with respect to Personal Information about you (not anyone else).

#### **18. International Transfer of Personal Information**

In addition, Hub may also share customer information within our family of companies for a variety of purposes, for example to provide you with the latest information about our products and services and offer you our latest promotions. Hub primarily stores data about customers in the United States. To facilitate our global operations, however, Hub may transfer personal data from your home country to other Hub companies in different locations around the world. If local law requires it, we will ask for prior consent to transfer your personal data outside of your geographic region.

**19. Questions/Updates to Policy**

Customers may contact Hub with any questions, concern, or inquiries about this Privacy Policy or company data. If you would like to make a formal complaint, please contact Hub’s Legal Department at [legal@hubgroup.com](mailto: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 cease services to you if necessary to satisfy your request.

Hub may review and update this Privacy Policy periodically without any prior notice.