



## HUB GROUP POLICY FOR VEHICLE EVENT TECHNOLOGY

Hub Group Trucking, Inc., Hub Group Dedicated, LLC, and their parent, affiliates and subsidiaries (together, "Hub Group") use vehicle event technology (the/this "Technology") to enhance the safety and security of Hub Group's workforce and other drivers on the road and to enhance the accuracy of investigations of accidents or other vehicle incidents. This Policy describes the information collected or captured by the Technology, how that information may be used by Hub Group and others, how that information is secured, a retention schedule applicable to such information and guidelines for permanently destroying such information.

### What information about Drivers does the Technology collect and store?

Depending on the configuration of the Technology in a particular vehicle, it may collect/capture the following information:

- **Internal and External Video Recordings.** Hub Group vehicles are video monitored by cameras with audio/visual capability and views of the vehicle interior (including occupants of the driver and passenger seats) and external views to the front, right, and left of the cab. The cameras operate while the ignition is on and for up to 15 minutes or more after the ignition is turned off. Portions of this video/audio recording may be uploaded from the device to Hub Group or to the servers of the third-party service provider(s) of the Technology, for example, in the following circumstances:
  - Immediately (or as soon as a wireless connection allows) when the camera detects that a potential safety incident has occurred, including, without limitation, and by way of example:
    - Smoking
    - Food or drink
    - Using a handheld device
    - Inattentiveness
    - No seat belt
    - Lens obstruction
    - Exceeding posted speed limit or violation of Hub Group's speed policy
    - Rolling stop
    - Critical distance
    - Following distance
    - Lane departure
  - If still available, when requested by Hub Group.
- **Information Related to Operation of the Vehicle,** including the following:
  - Vehicle location, movements and other vehicle details and meta-data, such as miles driven, speed, acceleration, braking, turns, following distance, lane departure and the like;
  - Contextual factors outside the vehicle, such as traffic lights and stop signs, proximity to other vehicles, whether the vehicle is in a construction or school zone;
  - Potential traffic violations, such as speeding, seatbelt non-compliance, or failure to stop at a stop sign;
  - Potentially risky driver behavior, such as distracted driving or drowsy driving.

### What is the purpose of collecting, storing, and using the information?

- To defend Hub Group's and/or its driver's position in investigations and legal proceedings.
- To support insurance claims or disputes.
- To promote driver safety and the safety of others, including by providing real-time in-vehicle alerts via the Technology when potentially dangerous conditions or behavior are detected.



- To support Hub Group operations, safety programs, and incident investigations, including fraud prevention.
- To troubleshoot and improve Hub Group's services and the driver experience.
- To provide evidence that will confirm or refute citations and roadside inspection violations issued to Hub Group and/or its drivers by law enforcement personnel.
- To assist with driver coaching and training.
- To provide data to be reviewed or used by Hub Group (or by third parties as authorized by Hub Group) for other legitimate business purposes.

### **With whom will Hub Group share the information derived from the Technology?**

- **Hub Group.** Hub Group may share the information collected through use of the Technology with Hub Group personnel that have a need to know or have access to the information for legitimate business purposes.
- **Third Parties.** Third parties (for example, accident investigators, insurance claims adjusters, law enforcement, service providers, etc.) may be permitted to access, use and retain the information collected through use of the Technology for legitimate and lawful purposes consistent with the purposes described above. The third-party service provider(s) of the Technology has access to the data to use for the business purposes stated in this policy.
- Except for the legally permitted purposes set forth above, Hub Group does not otherwise share the information derived from the Technology with others, for commercial purposes or otherwise. Hub Group does not sell, lease, trade, use for advertising or otherwise profit from the information.

### **How and for what time period is information obtained from the Technology stored, secured, and destroyed?**

- **Hub Group.** Prior to destruction as described below, Hub Group may use the information obtained from the Technology for the purposes stated in this policy. Hub Group shall utilize at least a reasonable standard of care within Hub Group's industry to store, transmit and protect from unauthorized disclosure such information and reasonably relies on its vendor(s) for the Technology and third parties who receive such information to do the same. Further, Hub Group's storage, transmission, and protection of such information shall be in a manner that is the same as or more protective than the manner in which it stores, transmits, and protects other confidential and sensitive information. Hub Group will take reasonable steps to permanently destroy the information in its possession that was collected, obtained, stored, or used from the Technology when the initial purpose for collecting, obtaining, storing, or using such information has been satisfied or within three (3) years of Hub Group's last interaction with the individual to which the information pertains, whichever occurs first (or longer at Hub Group's discretion if otherwise permitted by applicable law). The permanent destruction of such information shall be consistent with Hub Group's document destruction policies, guidelines, and practices.

*This Policy is intended to comply with applicable privacy laws, including, but not limited to, the Illinois Biometric Information Privacy Act, the Texas Capture or Use of Biometric Identifier Act, the Washington House Bill 1493, the California Consumer Privacy Act, and any other local, state or federal law that regulates the use and collection of biometrics whether that law is enacted at the time this policy is implemented or thereafter and supplements prior communications, policies and practices that relate to the use of this Technology, and similar, technologies.*

*Hub Group's third-party equipment vendor and service provider, Lytx, represents that the Technology has no biometric technology or biometric capability and that the Technology does not collect, store, or use scans of a*



*person's facial geometry or any biometric identifiers or biometric information identifiable to an individual. However, in the event that a scan of your facial geometry or any biometric identifier or biometric information is collected, obtained, stored, or used when the Technology is in use, you hereby consent to Hub Group and/or its service providers' collection, storage, receipt, use, access to, disclosure, redisclosure, dissemination, and destruction of it, effective as of the first date the Technology was used in connection with your employment, as explained in and pursuant to this policy. Hub Group and/or its service providers will treat any scan of your facial geometry or any biometric identifier or biometric information as confidential, sensitive information, use reasonable care to protect it from disclosure to unauthorized third parties who do not have a need for the information consistent with this policy and applicable law, and timely destroy it in accordance with applicable law.*