

PLEASE READ THIS POLICY CAREFULLY BEFORE USING the InForwarder WEBSITE

This privacy policy applies to AC Edwards, LLC, d.b.a. InForwarder (collectively “InForwarder” or “we”). Protecting your data, privacy and personal information is paramount to InForwarder. It is very important to us that our customers feel secure when using: <https://www.inforwarder.com> (the “Website”) and/or our Software and services (the “Software”).

This Privacy Policy applies to the information that InForwarder collects through our websites, online features, services, and Software owned or controlled by InForwarder.

This Privacy Policy also explains how InForwarder uses and discloses the Personal Data it collects from the individuals who visit our websites, individuals who engage with us in business activities and end-users of InForwarder Software and/or services. It also describes your rights in relation to the personal data that you provide to us.

Contact Information

If at any time you have questions about our privacy practices or any of your rights described in this InForwarder Privacy Policy, please reach out to the InForwarder Data Protection team at dataprotection@InForwarder.com.

What Personal Data does InForwarder collect?

When visiting our websites, inquiring about our Software, requesting marketing information, requesting a demonstration or applying for a job online, as appropriate you may be asked to enter certain Personal Data, such as your name, address, email address, phone number, company name or other personal details, to help us respond to you and to help you with your experience.

Why does InForwarder collect Personal Data?

InForwarder collects Personal Data primarily to provide a customized response to our visitors and business contacts, a customized experience to our Product’s’ end users, and for our own business purposes. InForwarder collects information, of which some can be considered Personal Data, in different ways from Visitors, Business Contacts and Customers who access the various parts of our Websites, Software and Services. Generally, we do not share this information with third parties. However, we may disclose personal information collected if we have received your permission beforehand or in very special circumstances, such as when we believe that such disclosure is required by law or other special cases described below.

How does InForwarder collect Personal Data?

In most cases, InForwarder collects personal data directly from you. We will ask you for Personal Data when you interact with us, such as contacting us through our websites for sales inquiries, requesting information on our company, , marketing communications, requesting a demonstration, or submitting your resume. For instance:

- **Business contact or End-user related information** is collected in association with use of our Software such as your name, company's name, business telephone number, business email address, and business title. This Personal Data is not shared with third parties.
- **Job applicant information** is collected from our online job application process. We collect your name, address, email address, telephone number and the information contained in your resume. This Personal Data might be shared with third parties to further the job application process.
- **Visitor information** is collected through your online interaction with InForwarder through one of two methods:
 - You contact us through the use of the Contact Us page on our websites and you provide your name, company name, email address, work phone, and cell phone.
 - We use cookies to collect information about your use of our websites and applications. We treat this information as Personal Data when it is associated with your contact information. For more information about cookies, please see the section **Cookies and Analysis** below.

How does InForwarder use Personal Data?

We strongly believe in both minimizing the Personal Data we collect and limiting its use and purpose to only that: (1) for which we have been given permission by you; (2) as necessary to deliver the Services you are entitled to; or (3) as we might be required or permitted for legal compliance or other lawful purposes. Therefore, InForwarder uses Personal Data for the following purposes:

- Business purposes for Personal Data pertaining to Professionals with whom InForwarder has a business relationship may be used as needed:
 - To initiate, assess, develop, maintain, or expand a business relationship, including negotiating, contracting, and fulfilling obligations under contracts;
 - For due diligence regarding the Individual's qualifications and eligibility for the relationship, including verifying the identity, qualification, authority, and creditworthiness of the Professional and obtaining publicly available information from third parties (such as screening companies);
 - To send transactional communications (such as requests for information, responses to requests for information, orders, confirmations, and product updates);

- For account management, accounting, finance, and dispute resolution purposes (such as accounts receivable and accounts payable) and for reporting;
 - To assure quality control and to enforce company standards and policies;
 - For risk management and mitigation, including for audit and insurance functions, and as needed to license and protect intellectual property and other assets; and
 - For security management, including monitoring Individuals with access to InForwarder's websites, Software, systems, or facilities, investigation of threats, and as needed for any Data Security Breach notification.
- InForwarder may use Personal Data to develop and improve our Software and/or services, and for research, analytics, and business intelligence.
 - InForwarder may use Personal Data for relationship management and marketing. This purpose includes sending marketing and promotional communications to individuals who have not objected to receiving such messages as may be appropriate given the nature of the relationship, such as product and service marketing, customer communications, customer satisfaction surveys, supplier communications, and InForwarder news.
 - InForwarder may use your Personal Data to communicate with you. We may contact you regarding Software or services you have expressed an interest in. We may also contact you with offers for additional services we think you will find valuable if you give us consent, or where allowed based upon legitimate interests.
 - InForwarder uses Personal Data for secondary purposes such as:
 - Internal audits or investigations;
 - Implementation or verification of business controls;
 - Statistical or historical research;
 - Dispute resolution;
 - Compliance with laws and company policies; and
 - Insurance purposes

Why and how does InForwarder disclose Personal Data?

InForwarder does not provide Personal Data to third parties for their own marketing purposes. We limit the sharing of Personal Data to the following:

- **Compliance with legal, regulatory and law enforcement requests.** We cooperate with government and law enforcement officials and private parties that we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (such as subpoena requests), to protect our property and rights or the property and rights of a third party, to protect the safety of the public or any person, or to prevent or stop activity we consider to be illegal or unethical. To the extent we are legally permitted to do so, we will take reasonable steps to notify you in the event that we are required to provide your personal information to third parties as part of a legal process.
- **Sharing with Trusted Third Parties.** We may share your Personal Data with third parties with which we have partnered to allow them to integrate their services into

our own Services and with trusted third party service providers as necessary for them to perform services on our behalf.

These third parties are subject to strict data processing terms and conditions and are prohibited from utilizing, sharing, or retaining your Personal Data from any purpose other than as they have been specifically contracted for (or without your consent).

- **Special Cases.** It is InForwarder's policy not to use or share Personal Data in ways unrelated to the ones described above without also providing you an opportunity to opt out or otherwise prohibit such unrelated uses. However, the Company may disclose Personal Data, or information regarding your use of the Software or websites accessible through our Software and/or Services, for any reason if, in our sole discretion, we believe that it is reasonable to do so, including: to satisfy laws, regulations, or governmental or legal requests for such information; to disclose information that is necessary to identify, contact, or bring legal action against someone who may be violating our Terms and Conditions or other user policies; to operate the Software properly; or to protect the company, our customers, and business contacts.

Cookies

InForwarder uses cookies to distinguish you from other users. This helps us provide you with a good experience when you use our website. You can control how cookies are placed on your devices and opt-out of having cookies by adjusting the settings on your browser. Since each browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies and other privacy settings that may be available. However, if you turn cookies off, some of the features that make your site experience more efficient may not function properly.

For detailed information on the cookies we use and the purposes for which we use them see our [\(Cookie Policy \(US\) - InForwarder\)](#).

International Data Transfers

InForwarder is headquartered in the United States of America. If you utilize our Services from a country other than the country where our servers are located, your communications with us may result in transferring your Personal Data across international borders. Also, when you call us, we may provide you with support from one of our global locations outside your country of origin. In these cases, your Personal Data is handled according to this Privacy Policy.

How you can control, revise or delete your Personal Data

InForwarder respects your right to control, revise or delete your Personal Data, or object to the processing (if any) of your Personal Data. You may choose to restrict the collection or use of your Personal Data in the following manners:

- Opting in or out of additional communications from InForwarder by checking the associated box on forms used within our websites.
- Accepting or refusing the use of cookies from our websites.
- Revoking your consent at any time, if you have previously agreed to our use of your Personal Data.

To exercise any of the individual rights afforded to you by applicable data protection laws and regulations, including asking for a copy of your Personal Data, please contact the InForwarder Data Protection Team at dataprotection@InForwarder.com. You may also write to us at the addresses listed in the How to Contact Us section below.

Applying for a job on our site

If you apply for a job through the InForwarder website, we, or a human resources company assisting us, may ask you to provide self-identifying information (such as gender, marital status, and ethnicity) in conjunction with laws and regulations enforced by local government and regulatory agencies. Providing self-identifying information is voluntary, but if you do provide us with that information, we may submit it to the local government and regulatory agencies for business-related purposes, including responding to information requests, fulfilling regulatory reporting requirements, and defending against employment related complaints.

How we secure, store and retain your data

The security of your personal information is important to us. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, therefore, we cannot guarantee its absolute security. Your personal information is contained behind secured and all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We retain Personal Data only for as long as necessary to provide services you have requested and thereafter for a variety of legitimate legal or business purposes. These might include retention periods:

- Mandated by law, contract or similar obligation applicable to our business operations;
- For preserving, resolving, defending, or enforcing our legal/contractual rights; or
- Needed to maintain adequate and accurate business and financial records.

If you have any questions about the security or retention of your Personal Data, you can contact us at dataprotection@InForwarder.com.

Age Restrictions

Our services are available for purchase only by legal entities or individuals who are over the age of 18. Our services are not targeted to, intended to be consumed by, or designed to

entice individuals under the age of 18. If you know of or have reason to believe anyone under the age of 18 has provided us with any Personal Data, please contact us at dataprotection@InForwarder.com.

Changes to the InForwarder Privacy Policy

InForwarder reserves the right to modify this Privacy Policy at any time. If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy and any other places we deem appropriate, so that you are aware of the information we collect, how we use it, and under what circumstances, if any, we disclose it.

How to Contact Us

If you have any questions, concerns, or complaints regarding this Privacy Policy, you may contact us at dataprotection@InForwarder.com. As an alternative, you may contact us by mail at one of the following addresses:

- For non-EEA Customers or Residents:

AC Edwards, LLC
Attn: Data Protection
924 West 75th Street, STE 120-173
Naperville, IL 60565

- For EEA Customers or Residents:

AC Edwards, LLC
Attn: Data Protection
924 West 75th Street, STE 120-173
Naperville, IL 60565

We will respond to all requests, inquiries or concerns within 30 days.

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