

PRIVACY STATEMENT - CALIFORNIA

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Statement of DeWitt Transportation Services of Guam, Inc. dba DeWitt Guam and its successors, parents, subsidiaries, affiliates, and related companies or other companies under a common control that we may have now or in the future operate (hereinafter referred to as either “DeWitt”, “DeWitt Guam”) and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice pursuant to California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

In addition to the information in the Privacy Policy, this CA Privacy Notice also describes:

- Categories of Personal Information we collect.
- Cookies we track.

As further described herein, your personal information may be collected, processed and stored by DeWitt Guam or its service providers in the United States and other countries where such servers reside. You hereby agree with and consent to the transfer of your personal information to the United States and other countries where we and our service providers operate. Regardless of where we transfer your information, we still protect your personal information in the manner described in this Privacy Policy.

PERSONAL INFORMATION WE HAVE COLLECTED IN THE PREVIOUS 12 MONTHS

Specifically, we collect the following:

Identifiers: Real name, alias, postal address, unique IP address email address, online identifier, unique personal identifier, telephone number, account name, Social Security number, driver's license number, passport number, other government identification number.

Customer records information: Name, signature, social security number, 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 or debit card number, other financial information, medical information, health insurance information.

Characteristics of protected classifications under California or federal law: Race, religion, sexual orientation, gender identity, gender expression, age disability.

Commercial information: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Internet or other electronic network activity information: Browsing history, search history, and information regarding a consumer’s interaction with Internet websites, applications or advertisement.

Geolocation data

Sensory data: audio, electronic, visual, thermal, factory, or similar information

Professional or employment-related information

Education information: Information that is not “publicly available personally identifiable information” as defined in the California Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99)

Inferences: The law also includes inferences that could be used to create a profile reflecting a consumer’s:

- Preferences
- Characteristics
- Psychological trends
- Predispositions
- Behavior
- Attitudes
- Intelligence
- Abilities
- Aptitudes

SOURCES OF THE PERSONAL INFORMATION WE COLLECT

Data You Provide to Us

We receive Personal Data when you provide them to us, when you purchase our products or services, complete a transaction via our Services, or when you otherwise use our Services.

Data We Automatically Collect

We automatically collect Data about you when you visit our website, visit our stores, and use our services. The types of Data we automatically collect include:

- Browsing behavior while you are on our website, which we collect using cookies and similar technologies.
- Device Data about your various devices to help us personalize your experience and serve you consistently (IP address, browser type, mobile device and advertising ID, operating system, language settings, etc.)
- Audio data when interacting with our phone systems.

- Images and audio of you, via security cameras at our physical locations

Data We Collect from Third Parties

We also collect Personal Data from Service Providers, Contractors, and Third Parties when they disclose that information to us.

COMMERCIAL AND BUSINESS PURPOSES FOR COLLECTING PERSONAL INFORMATION

We and our Contractors and Service Providers process Personal Data we hold for numerous business purposes, depending on the context of collection, your Privacy Rights & Choices, and our legitimate interests. We generally process Personal Data for the following “Business Purposes”:

- **Product and Service Delivery.** We process Personal Data as necessary to provide the products and services you purchase or request. This includes processing and completing your transactions, confirming your orders, and billing. For example, we process Personal Data to authenticate users and their rights to access the Products and Services or as otherwise necessary to fulfill our contractual obligations to you.
- **Security Incident Detection and Protection.** We may process Personal Data in connection with our legitimate interest in ensuring that our website and services are secure, to identify and prevent crime, prevent fraud, verify or authenticate users/individuals, and to ensure the safety of our customers. We may analyze network traffic, device patterns, and characteristics, maintain and analyze logs and process similar Personal Data in connection with our information security activities.
- **Internal Processing for Improving Products and Services.** We may use any Personal Data we process through our website and services as necessary in connection with our legitimate interests in improving the design of our services, understanding how our Services are used or function, for customer service purposes, for internal research, technical or feature development, to track service use, QA and debugging, audits, and similar purposes. It may also include receiving and processing your application for employment.
- **Compliance, Health, Safety, and Public Interest.** We may also process Personal Data as necessary to comply with our legal obligations, such as where you exercise your rights under data protection law, for the establishment and defense of legal claims, where we must comply with requests from government or law enforcement officials, and as may be required to meet national security or law enforcement requirements or prevent illegal activity. We may also process data to protect the vital interests of individuals, or on certain public interest grounds, each to the extent required or permitted under applicable law. Please see the How We Share Personal Data section for more information about how we disclose Personal Data in extraordinary circumstances.

- **As Permitted by Law.** We may process your Personal Data for other purposes, as permitted by applicable laws including for our agreements and other policies.

CATEGORIES OF PERSONAL INFORMATION WE HAVE SHARED WITH THIRD PARTIES IN THE PREVIOUS 12 MONTHS

We have shared the following categories of personal information with third parties in the previous 12 months:

- Identifiers
- Cookie information
- Browsing information
- Additional categories

CATEGORIES OF THIRD PARTIES WE HAVE SHARED PERSONAL INFORMATION WITH IN THE PREVIOUS 12 MONTHS

For each category of personal information, we have shared with third parties in the previous 12 months (as identified above), we have shared that information with the following categories of third parties.

- Identifiers
 - Affiliates
 - Service providers
 - Government authorities, law enforcement, and others
 - Business transfer participants
 - Additional recipients

CHILDREN UNDER THE AGE OF 16

Our website is not intended for children under 16 years of age. No one under age 16 may provide any personal information on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us using the Exercise Your Rights at the bottom of the website.

YOUR RIGHTS AND CHOICES

The CCPA provides California residents with specific rights regarding their Personal Information as described below.

Right to Know about Personal Information Collected or "Sold"

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. After we receive and confirm your verifiable consumer request, we will disclose to you within the time required by the CCPA, the relevant information, which may include:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose is 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.
- If we sold your Personal Information, or disclosed your Personal Information for a business purpose, two separate lists disclosing:
 - sales, identifying the Personal Information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

Right to Request Deletion of Personal Information

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. These exceptions include if we need the Personal Information for a reason related to our business, such as:

- Providing goods or Services to you.
- Detecting and resolving issues related to security or functionality.
- Complying with legal obligations.
- Conducting research in the public interest.
- Exercising free speech or ensuring another's exercise of free speech; or
- Using the information for internal purposes that a consumer might reasonably expect.

After we receive and confirm your verifiable consumer request, we will delete your Personal Information from our records within the time period required by the CCPA, unless an exception applies.

Right to Request Correction of Your Personal Information

You have the right to request that we correct any of your personal information that we have.

Right to Request Limit on the Use or Disclosure of Your Sensitive Personal Information

You have the right to request that we limit certain use and disclosure of Sensitive Personal Data. This right does not apply in cases where we only use Sensitive Personal Data where necessary, or for certain business purposes as authorized by applicable law.

Right to Opt-Out of the Sale or Sharing of Your Personal Information

Right to request to opt-out of the following:

- If we engage in sales of data (as defined by applicable law), you may direct us to stop selling Personal Data.
- If we engage in Targeted Advertising (aka “sharing” of Personal Data for cross-context behavioral advertising), you may opt out of such processing.

Exercising Your Rights

To exercise the rights described above, please submit a verifiable consumer request to us by

- Filling out a form using the Exercise Your Rights [\(Click here\)](#) at the bottom of the website.
- Calling our toll-free number (866) 262-7870

You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

Authorized Agents

As a California resident, you may give permission to an authorized agent to submit a request to know, delete, delete, or limit the use or disclosure of sensitive PI on your behalf.

If you use an authorized agent to submit a request to know or delete on your behalf, we may require:

- The authorized agent provides us with proof of your written and signed permission.
- That you must verify your identity directly with us; or
- That you directly confirm with us that you provided the authorized agent permission to submit the request on your behalf.

If you use an authorized agent to submit a request to opt out of sales or a request to limit the use or disclosure of sensitive PI on your behalf, we may require the authorized agent to provide us with your written and signed permission.

Non-Discrimination for the Exercise of CCPA Privacy Rights

We will not discriminate against you for exercising any of your CCPA rights. In particular, we will not:

- Deny you goods or services.
- Charge you different prices for goods or services, whether through denying benefits or imposing penalties
- Provide you with a different level or quality of goods or services.
- Threaten you with any of the above

Do Not Sell My Personal Information.

We do not, and have not, sold any of your information in the past 12 months. Please refer to the Privacy Policy sections on how we use your data for more information.

VERIFICATION

Verifying Your Requests

Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

If you submit a request, we typically must verify your identity to ensure that you have the right to make that request, reduce fraud, and to ensure the security of Personal Information. If an agent is submitting the request on your behalf, we reserve the right to validate the agent's authority to act on your behalf. We cannot fulfill your request if we cannot verify your identity.

We may require that you match personal information we have on file in order to adequately verify your identity. If you have an account, we may require that you log into the account to submit the request as part of the verification process. We may not grant access to certain Personal Data to you if prohibited by law.

COOKIES

When you access this Website, we may automatically gather information from your browser, such as your IP address, time and date of visit, browser type, referring/exit pages, internet service provider (ISP), and operating system. Our analytics platform may also capture additional information about your use of this Website. We use this information to analyze trends, administer this Website, track users' movements around this Website, and gather demographic information about our user base as a whole.

We may also use "cookies" and other user tracking devices (e.g., local shared objects), which are files or pieces of information that are stored by your browser on your computer's hard drive. We use cookies to collect information during your visit to this Website, such as the particular

Website areas you visit and the products or services you utilize or buy through this Website. We do this so that we can provide a continuous and more personalized shopping experience for you (e.g., to recognize you by name when you return to this Website).

We may also use “persistent cookies,” which will remain on your computer even after you close your browser, to understand general Website usage and volume statistical information (which does not include personal information) and improve the content and offerings on this Website. We may also use persistent cookies to store user preferences. While most browsers are set to accept cookies and other tracking devices by default, you are always free to decline our cookies if your browser permits, but some parts of this Website may not work properly if you do. Your browser manufacturer has information on changing the default setting for your specific browser.

To customize your cookie settings, please refer to the main Privacy Policy, section OTHER INFORMATION WE MAY COLLECT ONLINE INCLUDING USING COOKIES OR OTHER TRACKING TECHNOLOGIES

Cookies on our Sites are generally divided into the following categories:

- **Necessary Cookies:** Our website needs these cookies to function and cannot be switched off. Usually, they are only set when a website visitor requests services, such as selecting privacy preferences, filling out forms, or logging in. While a website visitor can set their browser to block and/or alert them to these cookies, some parts of the Website will not work as a result. Necessary Cookies do not store any Personal Information.
- **Functional Cookies:** The Website uses these cookies to enhance functionality and for personalization. They may be set up by our third-party providers or by us. Not allowing these cookies may impact the functionality of those services.
- **Performance Cookies:** Performance Cookies enable us to measure and improve the Website’s performance. They do this by measuring visits and the sources of those visits, meaning we can see the popularity of each page and how visitors navigate the Website. The information gathered by these cookies is anonymous because it’s aggregated. Not allowing these cookies means we will not know when visitors have visited the Website and as a result, we will not be able to monitor performance.
- **Targeting Cookies:** Our advertising partners may set these cookies. Our partners may use those cookies to build a profile of your interests and show visitors advertising relevant to them. They do this by uniquely identifying your device and your internet browser, and not by storing your Personal Information. Not allowing these cookies will result in less targeted advertising.
- **Social Media Cookies:** A variety of social media services we have added to the Website set these cookies. They enable visitors to share our content with their networks and friends by tracking the visitor’s browser across other sites and building up a profile of their interests. This results in different content and messages being seen on other websites visited. Not allowing these cookies may result in visitors not seeing or being incapable of using these sharing tools.

Global Privacy Control (GPC). Our website may support certain automated opt-out controls, such as the Global Privacy Control (“GPC”). GPC is a specification designed to allow Internet users to notify businesses of their privacy preferences, such as opting out of the sale/sharing of Personal Data. To activate GPC, users must enable a setting or use an extension in the user’s browser or mobile device. Please review your browser or device settings for more information regarding how to enable GPC.

Please note: We may not be able to link GPC requests to your Personal Data in our systems, and as a result, some sales/sharing of your Personal Data may occur even if GPC is active. See the “Regional Supplements” section below for more information regarding other opt-out rights.

Do-Not-Track (DNT). Our website does not respond to your browser’s do-not-track request.