**Privacy Notice**

Effective date: September 2022

Our Privacy Notice is available in PDF form here.

At HDOL, LLC (the “Company,” “we” or “us”), we respect your privacy and are committed to protecting it.

This Privacy Notice has been drafted to explain how we use, disclose, and protect information that we may collect when you (the “user” or “You”):

1. visit any website and/or web portal of the Company, including the online portal known as “HubDriveOnline” and any mobile application (collectively, the “Sites”); and/or
2. use the services made available on the Sites (collectively, the “Services”) in any manner.

In providing You the Services, we may collect the following information from You:

1. Information about You;
2. Information about Your business; and/or
3. Information about third parties (individuals or businesses) with whom you have a current or prospective business relationship.

We may receive the information from the following sources:

1. You, when You provide the information to us through the Services.
2. Third-party sources that You have authorized to share the information with us.

By sharing the information with us through the Services, or by authorizing a third-party to share the information with us, You represent and warrant, as applicable, that You have the legal right to share such information with us, to cause such information to be shared with us, and/or have obtained all necessary legal consents to share (or authorize the sharing) of such information with us. If You do not have such legal rights, have not obtained such consents, or do not agree to the terms of this Privacy Notice, do not use the Services. Your continued use of the Services indicates Your assent to this Privacy Notice and Your intent to be bound by its terms.

Please note that this Privacy Notice applies only to our information-gathering, use, and dissemination practices in connection with the Services. This Privacy Notice does not apply to any of our information practices conducted separately by us outside of the Services. Furthermore, this Privacy Notice does not apply to the information-gathering, use, and dissemination practices of any third party whom You have authorized to share information with us. You are encouraged to read the applicable third party’s own privacy notices with respect to any such information You share with the third party.

If in any case our privacy practices differ from those explained in this Privacy Notice, we will let You know you at the time we ask for or collect the information.

1. **What information we collect**

We may collect the following types of information, which we have grouped together as follows:

* **Identity Information**. Examples include first name, last name, social security number, marital status, title, date of birth and gender.
* **Contact Information**. Examples include billing address, shipping address, email address, state identification card information, driver’s license information, and telephone numbers.
* **Financial Information.** Examples include payment card detail (cardholder name, account number, expiration date, credit card numbers, and security codes), consumer report information, and taxpayer identification numbers.
* **Insurance Information (including information necessary to obtain insurance)**. We generally collect the amount and types of personal information that are required for us to perform insurance services on your behalf. This includes information that may be required by an insurance carrier or an industry service provider in the course of providing You with insurance coverage or related services. This could include assets and income, occupation and employment status, dependent information and other relevant financial information; information relating to any of Your past claims; information from reporting agencies and state and federal government agencies, such as state motor vehicle departments; information from other sources, such as medical or health care providers and other third parties with which You or we maintain a relationship; Your account activity and premium payment history; and credit card, bank account or other account information as may be required to facilitate Your payment of insurance premium or similar amounts.
* **Transaction Information**. Examples include details about payments to and from You and other details of products and services You have purchased from us.
* **Technical Information**. Examples include internet protocol (IP) address, Your login information, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices You use to access our website.
* **Profile Information.** Examples include Your username and password, purchases or orders made by You.
* **Usage Information**. Examples include information about how You use our websites, products and services.
* **Marketing and Communications Information**. Examples include Your preferences in receiving marketing from us and our third-party partners and Your communication preferences.
* **Demographic Information and Preferences**. Examples include personal characteristics and preferences, such as Your age, marital and family status, or number of children.
* **Onboarding information**. Examples include background check information; motor vehicle record (or, MVR) information; medical history and other medical information; drug screen information; and medical information, including information that may be deemed protected health information (or, PHI).
* **Electronic Logging Device (“ELD”) information.** Examples include an individual’s (or a piece of equipment’s) specific geographic location; ELD provider name, ELD account number, and ELD provider’s contact information; driving behavior, driving locations and driving activities as well as data regarding particular trips taken; and types of vehicles used and similar information.
* **Vehicle Identification Number**. We may collect the Vehicle Identification Number (or, VIN) for the vehicles You operate on behalf of Yourself or for another entity.
* **User Contributions**. Examples include feedback that You provide to us. If You choose to provide User Contributions, it may be made available on public areas of the Services or on or through our social media channels.

Some of the information we collect may be personal information, or personal data, that can be used to identify You or another natural person including, for example, name, email address, mailing address or delivery address. In some jurisdictions, certain unique identifiers like IP addresses and other usage or technical information may be considered personal information. Personal information does not include data where an identity has been removed so that we can no longer identify an individual (anonymous data), which we may use for any purpose.

1. How we collect the information

We collect the information in the following ways:

* **When You provide it to us.** You may give us information about by filling in forms or by communicating with us by email or otherwise. This includes information You provide when You register for an account.
* **From our websites and emails.** As You interact with the Services or our emails, we may automatically collect Technical Information about Your equipment, browsing actions and patterns. We collect this information by using cookies, server logs, web beacons, and other similar technologies. Our *Cookies and automatic data collection technologies* section contains more information and options to control or opt-out of certain data collection or uses.
* **From others.** We may receive information about from third parties including, for example, our affiliated companies, business partners, subcontractors, analytics providers, and service providers. We may also receive information from commercially available sources such as data aggregators and public databases. As referenced above, we may also receive information from third parties You have authorized to share information with us.

1. **Cookies and automatic data collection technologies**

The Services use automatic data collection technologies to distinguish You from other users. This helps us deliver a better and more personalized service when You use the Services. It also allows us to improve the Services by enabling us to:

* Estimate our audience size and usage patterns.
* Store Your preferences so we may customize the Services according to Your individual interests.
* Speed up Your searches.
* Recognize You when You return to the Services.

We also may use these technologies to collect information about Your online activities over time and across third-party websites or other online services (behavioral tracking). For more information, see the *Interest-based advertising* section of this privacy notice.

The technologies we use for this automatic data collection may include:

* **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of Your computer. For information about managing browser settings to refuse cookies, see *Your rights and choices*.
* **Flash Cookies.** Certain features of the Services may use Flash cookies (local stored objects) instead of browser cookies to collect and store information about Your preferences and navigation to, from, and on the website. For information about managing Flash cookies see *Your rights and choices*.
* **Web Beacons.** Our website pages, advertisements, and e-mails may contain small transparent embedded images or objects known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count website page visitors or email readers, or to compile other similar statistics such as recording website content popularity or verifying system and server integrity. For information about managing web beacons, see *Your rights and choices.*

We may use Google Analytics to provide certain analytics services for us. More information about Google Analytics can be found in the *Google Analytics Terms of Use* and the *Google Analytics Privacy Policy*.

We do not respond to or honor “do not track” (a/k/a DNT) signals or similar mechanisms transmitted by web browsers.

1. How we use the information

We may use the information to conduct our business operations including for the following purposes:

* To create and manage Your account.
* To provide You with products and services You request or purchase from us or from other third parties made available through the Services.
* To provide You with access to products and services from other third parties that are made available through the Services.
* To conduct market research.
* To develop and provide advertising tailored to Your interest and to determine the effectiveness of our advertising.
* To provide You with the information or support that You request from us, including to send You newsletters, if applicable.
* To improve our websites, products or services, marketing, customer relationships, and experiences.
* To develop new products and services.
* To notify You of special offers, discounts, updates, and products and services that we think may be of interest to You. To learn more about Your choices with regards to these communications see *Your rights and choices.*
* To manage our relationship with You which may include notifying You about changes to our Terms of Service or Privacy Notice, providing You notices about Your account, asking You to leave a review or take a survey, addressing any concerns You may have about our products or services.
* To provide You with the information, products, services or support that You request form us or to fulfill any other purpose for which You provide it.
* To deliver relevant content, advertisements, and messaging to You and to measure or understand the effectiveness of such content, advertisements, and messaging.
* To make suggestions and recommendations to You about our own and third-parties’ products or services that may be of interest to You. If You do not want us to use Your information in this way or for more information on how to adjust Your preferences, see *Your Rights and Choices*.
* To carry out our obligations and enforce our rights and to protect the Services, customers, and other individuals including to protect against or identify possible fraudulent transactions.
* For any other purpose as may be permitted by law/with Your consent or that we describe when You provide the information.

We may use information that is not personal information for any purpose. For example, we may aggregate usage data from many people in a way that does not identify any individuals to calculate the percentage of users accessing a feature on the Sites.

1. Disclosure of Information

We may share non-personal information without restriction. We may share personal information with:

* Any member of our corporate group, which means our subsidiaries, affiliates, our ultimate holding company and its subsidiaries, and affiliates.
* To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
* To contractors, service providers, and other third parties that we have provided You access to through the Services that need the information to provide their services to You, and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
* To our business partners who provide services on our behalf but who may also use the information we provide for their own commercial purposes. For example, some of our advertising partners may use information to market other parties’ products and service to You. For more information see *Interest-based advertising*.
* To public or government (including enforcement) authorities.
* To an actual or prospective buyer or other successor in the event of merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, where one of the transferred assets is the personal information we hold.
* If we offer a co-branded promotion, to our co-sponsor.
* To fulfill the purpose for which You provide it.
* For any other purpose as may be permitted by law/with Your consent or that we describe when You provide the information.

We may also disclose personal information:

* To comply with any court order, law, or legal process, including responding to any government or regulatory request.
* To enforce our *Terms of Service* and other agreements with You.
* To protect the rights, property, or safety of our business, our employees, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of cybersecurity, fraud protection and credit risk reduction.
* To investigate suspected violations of any law, rule or regulation, or the terms or policies for the Services.

We may also use Your information to contact You about our own and third-parties’ products and services that may be of interest to You. If You do not want us to use Your information in this way, please adjust Your user preferences in Your account profile or opt-out as directed when You receive such an email from us. For more information, see *Your rights and choices*.

1. Interest-based advertising

Some content or applications on the Sites, including advertisements, are served by third parties, including advertisers, ad networks, and servers, content partners, or application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about You when You use the Services. The information they collect may be associated with Your personal information or they may collect information, including personal information, about Your online activities over time and across different websites and other online services. They may use this information to provide You with interest-based (behavioral) advertising or other targeted content. Our partners may use non-cookie technologies on which browser settings that block cookies might have no effect. Your browser may not permit You to block such technologies.

For this reason, keep in mind, You can block the collection and use of information related to You by advertising companies for the purpose of serving interest based advertising by visiting the following platforms of self-regulatory programs of which those companies are members:

* The NAI’s opt-out platform is available *here*.
* The DAA’s opt-out platform is available *here*.

1. Third Party Content, Apps, and Links

Some content or applications on the Services may be served by third parties, content providers and application providers including the following:

* 1. **Plugins.** Our websites make available the option for You to use “plugins” that are operated by social media companies. If You choose to use one of these plugins, then it may collect information about You and send it back to the social media company that owns it. This may happen even if You do not click on the plugin, if You are logged into the social media website that owns the plugin when You visit the Services. Information collected by a plugin is subject to the privacy policy and terms of the social media company that makes it. If You do not want the social media company who owns a plugin to collect information about You when You visit the Services, sign out of the social media network before visiting. By interacting with a plugin when You are on the Services (for example, clicking the Facebook “Like” button), You are intentionally transferring information to that social media company. Further, if You are logged into a social media website when You visit the Services, then You are directing us to share Your data with the social media company that owns the plugin.
  2. **User Contributions.** The Services may allow You to upload Your own contributions to public areas of the Services. Any information You submit becomes public information, and we do not control how others may use the contributions You submit. We are not responsible for uses that may violate our privacy policy, the law, or Your intellectual property rights.
  3. **Third-party links.** The Services may contain links to other sites, which we do not control. Those websites have their own privacy policies and terms.

1. Your Rights and Choices

Your rights may vary depending on where You are located. We have created mechanisms to provide You with the following control over Your information.

* **Accessing, Updating and Deleting Your Information.** If You have an account with us, You may have the ability to access Your information and make updates to or delete Your data. If not, You can contact us as set forth in the *Contact Us* section below to request access to, correction of, or deletion of personal information that You have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or negatively affect the information’s accuracy.
* **Cookies and Automatic Data Collection Technologies**. You can set Your browser to refuse all or some browser cookies, or to alert You when websites set or access cookies. Flash cookies are not managed by the same browser settings as are used for browser cookies. To learn how You can manage Your Flash cookie settings, visit the Flash player settings page on *Adobe’s website*. However, if You disable or refuse cookies, please note that some parts of the Services may become inaccessible or not function properly. If You do not want Google Analytics to be used in Your browser, Google Analytics provides an opt-out tool which can be found *here*. In some cases, You may be able to set Your browser or email program to not download web beacons.
* **Interest Based Advertising**. Please see *Interest-based advertising* above for information on how to opt-out of interest-based advertising.
* **California Residents**. If You are a California resident, You may have additional rights and choices with regard to Your personal information. Please see *Your California privacy rights* for more information.
* **Nevada Residents.** If You are a Nevada resident, please see our *Nevada privacy* section below for more information our information practices.

1. Data Security

We have implemented measures designed to secure personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of information also depends on You. Where we have given You (or where You have chosen) a password for access to certain parts of the Services, You are responsible for keeping this password confidential. We ask You not to share Your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect personal information, we cannot guarantee the security of personal information transmitted to the Services. Any transmission of personal information is at Your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services

1. Children’s online privacy

The Services are not intended for users under 18 years of age. No one under age 18 may provide any information to or on the Services. We do not knowingly collect personal information from users under 18. If You are under 18, do not use or provide any information on the Services.

1. **Your California privacy rights**

The California Consumer Privacy Act of 2018 (“CCPA”) requires us to provide the following notice to California residents. This Notice applies solely to residents of the State of California who do business with us directly and/or visit the Services. This Notice does not apply to employment-related personal information about our employees, job applicants, contractors or similarly situated individuals. This Notice also does not apply to personal information about employees, owners, directors, officers, or contractors of any of our commercial clients to the extent the information is collected in connection with our relationship with any commercial client (“B2B information”).

1. Information we collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“personal information”). Personal information does not include:

* Publicly available information from government records.
* Deidentified or aggregated consumer information.
* Information excluded from the CCPA’s scope, like:
  + health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and
  + personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA) and the Driver's Privacy Protection Act of 1994.

The information we have collected about California residents in the last 12 months is described in *What information we collect* above. That information corresponds with the following categories of personal information under the CCPA:

|  |  |  |
| --- | --- | --- |
| **Category** | **Examples** | **Collected** |
| A. Identifiers. | A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers. | YES |
| B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). | A 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 card number, debit card number, or any other financial information, medical information, or health insurance information.  Some personal information included in this category may overlap with other categories. | YES |
| C. Protected classification characteristics under California or federal law. | Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information). | YES |
| D. Commercial information. | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | YES |
| E. Biometric information. | Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data. | NO |
| F. Internet or other similar network activity. | Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. | YES |
| G. Geolocation data. | Physical location or movements. | YES |
| H. Sensory data. | Audio, electronic, visual, thermal, olfactory, or similar information. | YES |
| I. Professional or employment-related information. | Current or past job history or performance evaluations. | YES |
| J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)). | Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records. | NO |
| K. Inferences drawn from other personal information. | Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. | NO |

In the last 12 months, we have collected personal information from the sources described in *How we collect information* above.

1. Use of personal information

In the last 12 months, we have used personal information for the business and commercial purposes described in *How we use the information* above.

1. Sharing of personal information

The business and commercial purposes that we have shared personal information in the last 12 months are described above in *Disclosure of information*. More specific information on that sharing is as follows:

* *Sharing Your personal information for business purposes*. We have shared the following categories of personal information with our affiliated companies, service providers and public or government (including enforcement) authorities for our business purposes:
  + Category A: Identifiers.
  + Category B: California Customer Records personal information categories.
  + Category C: Protected classification characteristics under California or federal law.
  + Category D: Commercial information.
  + Category F: Internet or other similar network activity.
  + Category G: Geolocation data.
  + Category H: Sensory data.
  + Category I: Professional or employment-related information.

As described above, examples of business purposes include performing transactions, registering accounts, managing our relationship with You, and monitoring for security threats and fraud.

1. Your right to know

You have the right to request that we disclose certain information to You about our collection, use, disclosure, and sale of Your personal information over the past 12 months. Once we verify Your request, we will disclose to You:

* 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 for collecting or selling that personal information.
* The categories of third parties with whom we share that personal information.
* If we sold 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.

We do not provide access rights to B2B information.

1. Your right to obtain a copy of Your personal information

You have a right to obtain a copy of the specific pieces of personal information we collected about You (also called a data portability request). Once we verify Your request, we will provide You a copy of Your personal information that is responsive to Your request.

We do not provide portability rights to B2B information.

1. Your right to delete Your 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. Once we verify Your request, we will delete (and direct our service providers to delete) Your personal information from our records, unless an exception applies.

We do not provide deletion rights to B2B information.

1. How to exercise Your CCPA rights

To exercise Your right to know, right to obtain a copy, or right to delete Your personal information as described above, please submit Your request to us by either calling us at 866-415-2207 or emailing us at information.requests@hubinternational.com.

1. How we verify requests and respond to requests

Before fulfilling Your request, we take steps to verify You are who You say You are or that You have authority to act upon someone else’s behalf. Therefore, upon receipt of Your request, we will request additional information that we need to verify You and, if You are submitting a request on behalf of someone else, to verify that You are permitted to act on that person’s behalf.

When we contact You to request verification information, please respond and provide the information that we have requested. Depending on the nature of the request You make, we may require You to verify Your identity to either a reasonable degree of certainty or high degree of certainty. This may mean that we need to match two or three pieces of information that we hold about You with information that You provide to us. In some cases, we may require You to sign a declaration under penalty of perjury that You are the consumer whose personal information is the subject of the request or that You are authorized to make the request on behalf of someone else.

In addition to providing the information we need to verify You or Your authority, You must provide us with enough information so that we can understand, evaluate, and respond to Your request. We cannot respond to Your request or provide You with personal information if we cannot confirm the personal information relates to You.

We will only use personal information provided in a verifiable consumer request to verify Your identity or authority to make the request and to locate relevant information. 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 to understand, evaluate, and respond to Your request.

We cannot delete personal information in those situations where our retention is required for our own internal business purposes or otherwise permitted by the CCPA (such as fraud prevention or legal compliance). In these situations, we will retain Tour information in accordance with our records retention program and securely delete it at the end of the retention period.

1. Who may submit requests?

Only You, or someone legally authorized to act on Your behalf, may make a request related to Your personal information. You may also make request on behalf of Your minor child. You may designate an authorized agent to make a request on Your behalf by registering such person or entity with the California Secretary of State.

1. How often You can submit requests?

You may make a CCPA consumer request twice within a 12-month period.

1. Response timing and format

We make every attempt to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform You of the reason and extension period in writing.

If You have an account with us, we will deliver our written response to that account. If You do not have an account with us, we will deliver our written response by mail or electronically, at Your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request’s receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. When You request a copy of Your personal information, we will select a format to provide Your personal information that is readily useable and should allow You to transmit the information from one entity to another entity easily.

We do not charge a fee to process or respond to Your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell You why we made that decision and provide You with a cost estimate before completing Your request.

1. Non-discrimination

We will not discriminate against You for exercising any of Your CCPA rights. You have a right not to receive discriminatory treatment by us for exercising Your privacy rights.

1. Other California privacy rights

California's “Shine the Light” law (Civil Code Section § 1798.83) permits users of the Services who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please write us at the mailing address below.

1. Nevada privacy rights

Nevada residents have the right to opt out of the sale of certain “covered information” collected by operators of websites or online services. We currently do not sell covered information, as “sale” is defined by such law, and we do not have plans to sell this information.

1. Changes to our privacy notice

We will post any changes we may make to our Privacy Notice on this page. The date the Privacy Notice was last revised is identified at the top of the page. You are responsible for periodically visiting the Sites and this page to check for any changes.

1. Contact Us

If You have any comments or questions about our Privacy Notice, please use contact us by calling us at 866-415-2207 or emailing us at information.requests@hubinternational.com.