U.S. Data Retention and Access Policy

It is CarrierWeb® policy that the data captured by a device provided by a CarrierWeb company and stored on any device or server, and/or information generated from the stored data, is the intellectual property of CarrierWeb user.

- 1. **Duration:** CarrierWeb® stores data online for customers. This data falls into two main categories:
 - a. Temporal data: Data records associated with a particular time (such as the location of a vehicle at a time, or the HOS status of a vehicle, or temperature settings in a reefer);
 - b. Non-temporal data: Data records not associated with a particular time (such as the description of a vehicle, or the location of a landmark or geofence).

Each customer can select a storage period; our default period, as required by Federal regulation, is six months and is included in our base price. Longer storage periods are available at a moderate monthly cost to meet individual customer policies and requirements. After the selected period has expired temporal data will be deleted from the online system. Non-temporal data is not deleted, should be maintained up-to-date by the user, and will generally be stored indefinitely, unless otherwise altered or deleted by the user.

- 2. **User control:** CarrierWeb® provides tools in the online system to allow customers to control which data is visible to which user accounts. Correct use of these tools to limit the access to data is the sole responsibility of the user unless CarrierWeb is directed in writing by the customer to make specific changes. These tools may be updated/replaced from time to time. They currently include, but are not limited to:
 - a. The creation of extra user accounts.
 - b. The control of visibility of specific data to specific accounts.
 - c. The ability to subcontract data to allow users from another customer to view data.
- 3. **APIs:** CarrierWeb® currently provides a tool called the EAI (External Access Interface), and may from time to time add new APIs to allow customers to access their data, or for customers to allow third parties to access their data. The customer has sole responsibility for the management and use of all data attained via any such API.
- 4. **Redundancy**: CarrierWeb® mirrors data real time to reduce the risk of data loss. While procedures may change periodically, currently there are several levels of redundancy:
 - a. RAID: customer data is stored on a redundant array of disks, so in each server all data will be stored on at least two disks (or SSDs) to mitigate the risk of data loss when storage devices fail.
 - b. Local hot spare: live data is mirrored onto a hot spare server located close to the main server. This mitigates the risk of data loss if the main server fails.
 - c. Offsite hot spare: customer data is also mirrored to a hot spare on a second site. This mitigates the risk of data loss in the case of a catastrophic failure of the primary hosting site.

While CarrierWeb® takes great care to ensure that customer data is not lost for the duration of the retention period, CarrierWeb® cannot be held liable for data loss in situations outside of their control.



- 5. Data stored for testing/statistics/other internal use: Apart from the online system CarrierWeb® may store and use captured data for testing/statistics/other internal uses, such as improving our system, or performing research on how our customers use our system. This data will not be shared outside the CarrierWeb® group and their approved IT suppliers.
- 6. Anonymous usage data: CarrierWeb® reserves the right to use anonymised usage information for any purpose. For example, vehicle speed and position data can be used to monitor congestion of highways.
- 7. Sales process: In conjunction with a user's approval, CarrierWeb® reserves the right to demonstrate the CarrierWeb® system to prospective customers using existing Information.
- 8. Law enforcement: In the event of a litigation and upon proper notification from legal proceedings, CarrierWeb® may be required to provide information to a court or court-appointed representative. CarrierWeb® will inform the user that such a demand has been served.