

## Montway Privacy Policy

**Updated and Effective: 10/10/2024**

Welcome! This privacy policy (“Privacy Policy”) describes our data and privacy practices for data collected and processed by Montway LLC or one of its affiliated companies (collectively, “Montway”) through this website and the content contained therein, and any other website, feature, or service we offer that post or provides this policy (“Site”). “We,” “our” means Montway and its affiliates. “You,” “your,” “visitor,” or “user” means the individual accessing this Site and/or using our services.

Please read our [Terms of Use](#) to understand the general rules about your use of this Site, and any additional terms that may apply when you access particular services or materials on certain areas of this Site.

You agree that your access and use of the Site is governed by this Privacy Policy and Montway’s Site Terms of Use.

### **Personal, Sensitive, and Non-Personal Data We Collect**

We collect data about users of the Site directly, automatically when you visit the Site, and sometimes from third parties. Some of this data may be considered “personal data” or “personal information”, and some of which may be considered “sensitive”, under applicable laws.

We will also treat other information, including IP addresses and cookie identifiers, as “personal data” where required by applicable law and we will treat certain personal data as “sensitive data” as required by applicable law.

Note that we may de-identify or pseudonymize personal data so that it is non-personal, such as aggregating (such as combining it with data about other individuals) and/or converting it to a code, sometimes using a functional commonly known as “hash”, or otherwise removing characteristics that make the data personally identifiable to you. We maintain and use de-identified data without attempting to re-identify it, except where permitted by applicable law, such as to determine whether our de-identification processes satisfy legal requirements.

We will treat de-identified or pseudonymized data as non-personal to the fullest extent allowed by applicable law. If we combine non-personal data with personal data, then we will treat the combined information as personal data under this Privacy Policy.

### **Personal Data You Provide to Us Directly**

#### ***Contact and Service-Related Data***

We collect certain personal data from you directly, such as your name, address, email address, phone number, zip code, car make/model, ship to and from location, and other information you provide to us when booking our services, requesting a quote for our services, or interacting with or through the Site. This may include photos and/or videos provided in connection with a claim submission.

#### ***Your Posts***

We may offer the ability to submit or post messages, reviews, social media posts, or other content (“User Content”) through interactive or other features, such as reviews, discussion forums, blog comments,

gallery posts, or promotional activities (“Submission Features”). Your submission of User Content is subject to the [Terms of Use](#) for the Site (including the User Content and Acceptable User terms) which give us right to use your User Content, online and offline, in connection with our promotional activities.

Personal information, such as your name, username (from the Site or your social media account), or where you reside, may be publicly displayed with your User Content. Others may access it, use it, and share it. We are not responsible for how others use User Content you submit or post. In addition, in connection with certain activities, your personal information may be disclosed publicly, for example, being identified as a winner of a sweepstakes or being awarded a prize.

If you choose to post messages on our Site, we will collect such information about you as you may choose to disclose pursuant to your activities on the Site.

### ***Chats & Other Communications & Correspondence***

If you send us e-mails, letters or other personal correspondence or contact us through the Site’s chat functionality, or if other users or third parties send us correspondence about your activities or postings on the Site, we may collect such information into a file specific to you or share it with third parties who provide services to us, such as web functionality.

Communications with our customer service agents may be recorded or monitored and used and retained to assist you and provide customer service, for quality assurance and to be able to better serve you, and to improve our products and services. If you do not consent, please do not continue with chat assistance or send other communications or correspondence to us.

### ***Your Payment Information***

If you establish a credit account with us or purchase any of our services, we collect your payment information and some additional information, including billing address, credit card number, and credit card expiration date.

### ***Sweepstakes, Contests, and Promotions***

We may offer sweepstakes, contests, or other promotions (any, a "Promotion"), that may require registration. By participating in a Promotion, you are agreeing to the provisions, conditions, or official rules that govern the Promotion, which may require specific requirements of you (including, without limitation, and except where prohibited by law, allowing the sponsor(s) of the Promotion to use your name, voice, likeness, or other indicia of persona in advertising or marketing materials). If you choose to enter a Promotion, personal data may be disclosed to third parties or the public in connection with the administration of such Promotion, including, without limitation, in connection with winner selection, prize fulfillment, as required by law or permitted by the Promotion’s terms or official rules (such as on a winners list).

### ***Data We Collect Automatically Through Your Access or Usage of Our Site***

We and our third-party business partners (including any third party service providers or third party content, advertising, and analytics providers) may use a variety of technologies, including cookies and pixels, that automatically or passively collect certain information about you, your device, or household, whenever you access, use, or otherwise interact with the Site (“**Device ID/Interaction Information**”).

Device ID/Interaction information may include, but is not limited to, device information (e.g., your device model, operating system version, web browser type and language, mobile network information), the URL that you just came from, which URL you next go to, access times, search times, approximate geolocation data, your IP address, mobile device identifier, or other unique identifier, search terms, pages viewed, time of your last interaction, time spent on the Site, and other details about how you've used the Site or our content and identifiers associated with cookies or other technologies that may uniquely identify your device or browser. We may combine this information with information obtained from other third-party sources along with quotes we provide to you to personalize the services we provide and the experience you have when interacting with us.

**Device ID/Interaction Information may be collected through the use of the following technologies:**

*Cookies and Local Storage*

A cookie or local storage is a text file that is stored on your device when it is used to visit the Site. Certain web browsers and browser add-ons may provide additional local data storage mechanisms. We and third parties may use cookies and similar technologies to keep your use of the Site more secure, help us see which features are most popular, count visitors to a page, study the effectiveness of our customer communications, maintain the integrity of the Site, to measure crash analytics and other maintenance related data, to manage and measure the performance of advertisements displayed on or delivered by or through the Site, and to personalize your experience through the Site, such as to recognize you when you return to the Site and just generally to provide you with a better, more intuitive, and satisfying experience. Some features of our Site may only be available through the use of essential cookies.

Your browser may allow you to disable, decline, block or otherwise limit or clear cookies. For more information about how to manage cookies, please follow the instructions provided by your browser. For more information about cookies, please visit <https://www.aboutcookies.org>.

*Pixel Tags*

Small graphic images or other web programming code (also known as web beacons or pixel tags or clear GIFs) may be included in our web pages and email messages. These and similar technologies may be used for a number of purposes by us and our third-party providers, including to count visitors to the Site, to monitor how users navigate Site, to count how many of our email messages were opened, or to count how many particular products were viewed, or for marketing and targeted advertising purposes. The data we collect through this technology may include the first date and time you open our email, and whether you click any links included in our email.

*Embedded Scripts*

An embedded script is programming code that is designed to collect data about your interactions with the Site, such as the links you click on. The code is temporarily used by our server or a third party service provider or business partner while you browse or interact with the Site and is deactivated or deleted when you disconnect from the Site.

*Data Collected Through Mobile Devices and SDKs*

We use embedded scripts and tools provided in Software Development Kits (“SDKs”) to collect data through mobile devices such as hardware model, operating system and version, identification numbers assigned to your mobile device, such as the ID for Advertising (IDFA) on Apple devices, and the Advertising ID on Android devices, mobile network data, and website usage behavior. SDKs are software packages that contain a set of tools that can be used to build applications and implement new features in existing apps, including those that collect data from your device. Your mobile operating system may let you opt-out from having certain device identifiers used for interest-based advertising. You should refer to the instructions provided by your mobile device’s manufacturer; this information is typically available under the “settings” function of your mobile device. If your mobile device offers an uninstall process, you can stop us from collecting information through the app by uninstalling our app.

### *Session Replay Technology*

Montway may record through session replay technology your interactions with the Site, such as what pages you visit on the Site, how long you visit those pages, and any links you click or data you provide. We use this data for our internal business purposes, such as for website analytics, to improve the Site and our products and services, and to address functionality issues.

### **Data We Collect from Third Parties**

We may receive data about you from third parties, such as data aggregators, lead generation companies, joint marketing partners, third party websites, service providers and other business partners. We may also supplement the data we collect with outside records from third parties, such as public databases, publicly available social media pages, and third parties who enhance the data we have about you, in order to provide you with information or services you have requested, to tailor content, to offer you opportunities to purchase products or services that we believe may be of interest to you, and for other purposes. The data collected and stored by third parties is subject solely to the third party’s privacy practices.

### **How We Use Data**

We may use information we collect, including personal data and Device ID/Interaction Information, as follows:

- **To provide the Site and services to you**  
Montway uses the personal data we collect to provide the Site and our services to you and to improve the Site and products and services we offer, including to process and fulfill your purchases, maintaining your account and verifying information you provide to us, such as your email address, is active and valid, facilitating your participation in a sweepstakes, contest, or promotion, respond to your inquiries and provide customer service.
- **For Advertising Activities and Marketing Messages**  
Montway uses data to customize and optimize content for you, such as recommendations, promotions, and advertisements we display through the Site and elsewhere online, and to use your contact information to send you new product offers and other marketing communications.
- **For Personalization**

Montway uses data to give each user a more consistent and personalized experience when interacting with us, including to tailor content and advertising we display to you or others, on the Site or elsewhere, including content in emails we may send to you, to tell you about new products, promotions, opportunities, or other general information about Montway or other products and services that we believe will be of interest to you.

- **For Internal Business Purposes**

For our normal operating procedures and internal purposes, including to improve the Site and our products, services, and marketing endeavors, to track marketing effectiveness, for marketing research, to detect and troubleshoot problems, monetize our Site, understand how you use the Site, including tracking traffic, usage, trends, and navigation patterns, conducting sales auditing.

- **For Security**

We also use such information for security and to protect the integrity of our Site, to investigate or detect fraud or illegal activities, and for archival and backup purposes in connection with the provision of the Site.

- **Administrative Notices**

We use your information to contact you regarding administrative notices, and communications relevant to your use of the Site, content, products, or services you use or request, and in our discretion, changes to our policies.

- **Billing and Support**

If you open a credit account with us through our Site, we use your address and billing information to bill you and provide associated support.

- **Legal and Dispute Resolution**

We use information in the file we maintain about you, and other information we obtain from your current and past activities on the Site, to comply with the law, cooperate in governmental or other legal inquiries, fulfill regulatory reporting obligations, resolve disputes, troubleshoot problems, protect our or others' rights, assets, and safety or security, and enforce our agreements and policies, including the Site Terms of Use.

- **Business Transitions**

We may use information in connection with a merger, acquisition, consolidation, bankruptcy, or other corporate transition, including during due diligence.

- **Other Purposes as Disclosed**

We may use data for other purposes as disclosed at the time of collection or otherwise with your consent.

### **Our Disclosure of Data to Third Parties**

We may share non-personal data that we collect, such as certain Device ID/Interaction Information, aggregate user statistics, and hashed or otherwise de-identified or pseudonymized data (including email

addresses), and/or our analyses derived from such data, with third parties in our discretion as permitted by law, including for targeted advertising purposes. We do not share your personal data with third parties for those third parties' direct marketing purposes without providing you the ability to consent (opt-in or opt-out).

Please note that we are not responsible for the privacy practices of any third party. If you decide that you do not want to receive communications from a third party, or have questions about their privacy practices, you will need to contact that third party directly. We may share the data we have collected about you (including personal data) in the circumstances described below or elsewhere in this Privacy Policy, as disclosed at the time you provide data, or otherwise with your consent.

**Montway Family of Companies.** Montway includes several brands and companies, some of which operate as subsidiaries or affiliates. You can see our brands here: [Auto Shipping Group and Consumer Direct Transport](#). When Montway collects data through any of our brands or companies, it will be accessible across the Montway family of brands and companies. The data will be used for business, operational, and marketing purposes.

**When You Direct Us To Share Your Information or With Your Consent.** We may share information when you direct us to do so, including when you log in through a third-party application or feature through which information is shared, or if we present you with an opportunity to receive marketing offers from a third party. Please note that we are not responsible for the privacy practices of third parties. If you later decide that you no longer want to receive communications from a third party, you will need to contact that third party directly.

**Third Party Service Providers Performing Services on Our Behalf.** We may share your personal data with our service providers to perform the functions for which we engage them, including the functions described in the above section entitled, "Personal, Sensitive, and Non-Personal Data We Collect and How We Use It". For example, we may use third parties to host the Site or assist us in providing functionality on the Site (including chat functionality), provide Site data analysis and research, to send out email updates about the Site or our products and services, and to make automated calls with respect to our products and services or to respond to your inquiry.

**For Legal and Administrative Purposes.** We also may share information that we collect from users as needed to enforce our rights, protect our property or protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions. We will disclose personal data as we deem necessary to respond to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request or other legal or regulatory process. We may also share Personal Data as required to pursue available remedies or limit damages we may sustain.

**Law Enforcement.** We may disclose any information about you to law enforcement or other government officials as we, in our sole discretion, believe necessary or appropriate, in connection with an investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose us to legal liability. This may involve sharing various information relating to our users and fraudulent or potentially fraudulent activities with our fraud prevention, credit risk reduction, and similar service providers, and they will use this information to help us and their other clients prevent fraudulent and illegal transactions.

**Changes of Control.** We may transfer or assign information, including your personal data, in connection with a merger, acquisition, reorganization, liquidation, change in control or other sale by or of us or any affiliated entity (in each case whether in whole or in part). We may also share your personal data in the due diligence process or to otherwise facilitate any such transaction, and with individuals assisting in the transaction or in connection with a bankruptcy.

**Employment Applications.** If you apply for a job with us, we or our service provider(s) may ask you to provide self-identifying information (such as veteran status, gender, and ethnicity) in conjunction with laws and regulations enforced by the Equal Employment Opportunity Commission and other federal, state, and local regulatory agencies. Providing such self-identifying information is voluntary, but if you do provide such information, we and/or our service providers may submit that information to the appropriate government or regulatory agencies to fulfill reporting requirements and use that information to defend against employment-related complaints. Please note that we may utilize a careers portal that is operated by a third party, in which case, your registration and use of the careers portal will be subject to the third party's privacy practices as disclosed on the portal.

### **Third Party Advertisers and Analytics and Similar Third Parties.**

We may use third party business partners, such as analytics companies, ad agencies, network advertisers, and others who provide us with data about the Site, users, and our advertisements, and who deliver ads to you on our behalf on the Site and elsewhere online. We are third party business partners collect certain data about your visits to and activity on the Site and other websites and services, and may use this data to target advertising to you and others and to assess the effectiveness of our advertising. We may also disclose (or permit third parties to collect) data, such as Device ID/Interaction Information, aggregate or de-identified, pseudonymized or hashed information (including email addresses) with these third parties for similar purposes.

These third parties may set and access their own tracking technologies on your device (including cookies, pixel tags or other technology) and may otherwise collect or have access to your personal data over time, including about your visits to the Site as well as other websites and online services, some of which may be personal information or personal data under various state laws. Companies that we share data with, including ad agencies and networks, may use the data, often in combination with their existing data, in order to present more relevant advertisements that may be of interest to you, and to help us and third parties to do the same.

- **Cookie Opt-Out Tools.** To disable sharing through cookies set on our site by third parties for advertising and analytics purposes, please adjust your settings by clicking on 'Cookie Preferences' in the footer.
- **NAI/DAA Opt-Out.** Some of the companies we use may be members of the Network Advertising Initiative ("NAI") or Digital Advertising Alliance ("DAA"). The NAI provides information regarding targeted advertising and the [opt-out procedures of NAI members](#), including opt-out mechanisms for web browsers and mobile devices, and a tool to opt out from participating NAI members using your hashed email address for interest-based advertising. You may also want to visit the [DAA's website](#), which provides information regarding targeted advertising and offers an opt-out for DAA-participating companies and the European DAA online choice page at <http://youronlinechoices.eu/>.

- **Mobile Device/AppChoices.** Mobile devices may contain settings that allow you to disable tracking advertising and/or analytics. In addition, the digital advertising industry has provided the ability for mobile users to register at [AppChoices](#) for their intent not to receive targeted advertising.
- **Google Analytics.** We use Google Analytics, which uses cookies and similar technologies to collect and analyze data to help us understand how the Site is used and report on activities and trends. This service may also collect data about the use of other websites, apps, and online services. You can [learn about Google's practices](#), and opt out of them by downloading the [Google Analytics opt-out browser add-on](#).

Please note that opting out through these mechanisms does not opt you out of being served advertising, and that you will continue to receive generic ads while online. Your opt-out choices are browser and device specific; if you disable your cookies, upgrade your browser after opting out or if you use multiple different devices, please opt-out on each device and each browser separately.

### **Social Media and Other Third-Party Platforms**

The Site may permit or facilitate interactions with an interactive third-party website or service ("**Social Media**"), such as enabling you to "like" or "share" content. If you choose to share content or otherwise post information from or via the Site to Social Media, that data may be public, and the third party may have access to data about you and your use of the Site. You may also choose to participate on Social Media in a way that connects that third-party service with the Site (such as posting to one of our pages on a Social Media site). Doing so may allow us to collect (or the third party to share) data about you. These third-party Social Media platforms may be able to collect certain data about your visits to the Site regardless of whether or not you affirmatively interact with the feature and whether or not you are logged into (or have) an account with the third-party platform.

We may also receive data about you if other users of Social Media give us access to their profiles and you are one of their connections or "friends". The data we collect is subject to this Privacy Policy. The data collected and stored by the third party remains subject to the third party's privacy practices, including, without limitation, whether the third party continues to share data with us, the types of data shared, and your choices with regard to what is visible to others on that third-party website or service. The third party may allow you to remove the application or feature, in which case we will no longer collect data about you through the application or feature, but may retain the data previously collected.

### **Third Party Links and Content**

Montway is not responsible for the privacy policies of third parties or other Sites, even if they are linked to our Site. Montway includes these links solely as a convenience to you, and the presence of such a link does not imply a responsibility for the linked site or an endorsement of the linked site, its operator, or its contents. Please make sure you read their privacy policy before using those sites when you leave our Site.

### **Your Choices**

**Marketing Messages from Us.** You may opt-out of marketing communications as set forth below.

- **Email.** You may unsubscribe from marketing emails we send you through the opt-out mechanism included in each such email. Note, however, that we reserve the right to send you certain



communications relating to your use of the Site, notices of changes to this Privacy Policy or other terms, or similar administrative and transactional messages.

- **Text Messages.** If you sign up to receive SMS, MMS or RCS messages from Montway, you may unsubscribe by replying “STOP” to the short code and get help by replying “HELP”. For additional information, please read our [Text Message Terms and Conditions](#).
- **Push Notifications.** We may send promotional and non-promotional push notifications or alerts to your mobile device, and may in some cases do so based on your device’s location or physical proximity to a beacon. You can elect to stop receiving those messages at any time by changing the notification settings on your mobile device.

### **Correct Your Information.**

- You are responsible for maintaining the accuracy of the data you submit to us, such as your contact data. If you would like to request to correct your information, you may do so by emailing [privacy@montway.com](mailto:privacy@montway.com). Montway will make good faith efforts to make requested changes in our then active databases as soon as reasonably practicable. Note, however, that data may persist internally for administrative purposes and that residual data may remain on backup media or for other reasons.
- **Data Privacy Choices.** Certain states provide additional rights. Please see below for information on additional rights you may have.

### **Security**

When Montway is creating, maintaining, using or disseminating personal data we will take commercially reasonable and appropriate measures designed to protect it from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of the personal data. Montway cannot and does not guarantee absolute protection and assumes no liability for any disclosure or loss of data in any case. We cannot guarantee or promise that your personal data or private communications will remain private. For example, hackers or third parties may unlawfully intercept or access transmissions or private communications on our Site. You use the Site and provide us your data at your own risk.

### **General Audience Site**

This Site is general audience and does not target users younger than 18 and we do not knowingly collect personal data directly from any person younger than the age of 18.

### **Consent to Transfer**

Montway is a US-based company. Please be aware that the data we collect will be transferred to and processed in the United States and other countries. By accessing or using the Site, or providing us with any data, you fully understand and unambiguously consent to this transfer to, and processing, usage, sharing, and storage of your data in the United States and other jurisdictions, for which the privacy laws may not be as comprehensive as those in the country where you reside and/or are a citizen. As a result, this data may be subject to access requests from governments, courts, or law enforcement in the United States and other countries according to the laws in those jurisdictions.

### **Contact Information; Questions and Changes in Information**

If you have any questions regarding this Privacy Policy please contact us at [privacy@montway.com](mailto:privacy@montway.com) or at (888) 497-9792.

### **Notification of Changes**

To the extent permitted by applicable law, we reserve the right to change or modify this Privacy Policy at our discretion at any time. We will notify you of material changes by posting the changed or modified Privacy Policy on our Site. We may also provide notice to you in other ways, such as through contact information you have provided. Any changes to our Privacy Policy will be posted to this page so users are aware of the information we collect and how we use it. Accordingly, please refer back to this Privacy Policy frequently as it may change. Your continued use of the Site after the effective date of the revised Privacy Policy (or such other act as specified in the revised Privacy Policy) will, to the fullest extent permitted by applicable law, constitute your consent to those changes. However, we will provide notice and obtain your consent (opt-in or opt-out) if required by law. Note that you may need to consent to our new policies to continue using the Site.

### **Jurisdiction Specific Rights**

Residents of certain U.S. states and countries may have the ability to exercise additional rights and choices regarding their personal data. We will take reasonable steps to accommodate your request, but may need to verify your identity before doing so. If you are a resident of a U.S. state with specific rights, please see additional information below. Residents of the EEA/UK/Switzerland, please see additional information below.

### **U.S. State Specific Rights**

#### **Notice to Nevada Residents**

Under Nevada law, we do not sell your Personal Data. However, if you are a Nevada resident, you may submit a request that we not sell any Personal Data we have collected about you by contacting us as set forth below. Your request must include your full name, street address, city, state, zip code, and an email address so that we can contact if needed regarding this request. If you previously provided a phone number, it will assist us in making sure we identify you as someone who wants to opt-out. You may also be required to take reasonable steps as we determine from time to time in order to verify your identity and/or the authenticity of the request. Montway will respond to your request within sixty (60) days either confirming that your request has been processed or indicating that we need an additional thirty (30) days to complete the request.

#### **Notice to Oregon and Texas Residents**

We set forth above the categories of personal data we process, the purpose for processing personal data, the categories of personal data shared, and the categories of third parties with whom personal data is shared. Residents of Virginia, Colorado, Connecticut, Montana, Oregon, Texas, and Utah have certain privacy rights with respect to this data, as described below.

**If you are a Consumer residing in Oregon or Texas (as defined in each state's respective law) and would like to exercise your applicable rights, please call us at (888) 497-9792 or email [privacy@montway.com](mailto:privacy@montway.com).**

- **Access Your Personal Data/Data Portability** - To confirm whether we are processing your personal data and request to access such data, please follow the instructions above. Where required by law, this includes to obtain a copy of the personal data we hold about you and, where permitted by applicable law and to the extent feasible, in a readily usable format to allow data portability. For Oregon residents and where provided by applicable law, this includes a list of third parties with whom we have shared personal information.
- **Delete Your Personal Data**– You may submit a request to delete your personal data.
- **Correct Your Personal Data** – You may submit a request to correct the personal data we hold about you.
- **Opt-Out of Targeted Advertising** – Montway engages in online advertising practices (and certain analytics or similar activities) that may be considered “targeted advertising” under these states’ laws. To disable sharing through cookies set by third parties that may be considered targeted advertising under such laws, manage cookie preferences through the link in the footer of the website. Please also review the Third Party Advertisers and Analytics and Similar Third Parties section above for information on industry tools and device settings that may be available to you.
- **Opt-Out of Sales of Your Personal Data** – Montway does not sell data for monetary compensation, but may sell your data as defined by OR and TX, which includes sharing data with third party advertising and analytics companies to help enhance data we have about you and find potential customers similar to you. To opt-out of the sales of your personal data please follow the instructions above.
- **Right to Appeal** - If, for any reason, you would like to appeal our decision relating to your request and you are a resident of Oregon or Texas, you have the right to submit an appeal and can do so by calling us at (888) 497-9792 or emailing [privacy@montway.com](mailto:privacy@montway.com). Please include your full name, the basis for your appeal, and any additional information to consider.
- **Sensitive Data** – If you are an Oregon or Texas resident, we will obtain your consent to the processing of any Sensitive Data (as defined by the applicable state law) we collect. If you wish to opt out of our processing of your Sensitive Data (as defined by the applicable state law), please email us at [privacy@montway.com](mailto:privacy@montway.com).

## Notice to California Residents

### California Privacy Notice

This California Privacy Notice\* is updated and effective as of **10/10/2024**

\*Terms (including defined capitalized terms) used in this California Privacy Notice have the same meanings given in the CCPA, CPRA, and the associated regulations, unless otherwise defined.

**If you are a resident of California, under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (“CPRA”), and any implementing regulations adopted thereunder, this notice supplements the information contained in Montway’s Privacy Policy and provides you the rights to:**

- Know what Personal information about you Montway has collected, disclosed, or sold/shared, if any, and to request to access specific pieces of personal information Montway has collected about you.
- Delete personal information we have collected from you.
- Correct inaccurate personal information we hold about you.
- Opt-out of the sale or sharing for cross-context behavioral advertising of your personal information.
- Not be discriminated against for exercising any of the aforementioned rights.

**To exercise the rights described above, you must submit a verifiable request to us at the following contact information and providing the requested information.**

Toll-free telephone number: (888) 497-9792

Email: [privacy@montway.com](mailto:privacy@montway.com)

### **Verifying Your Request**

To submit a verifiable request, you will be asked to provide certain information to help us verify your identity. The information we ask you to provide to initiate a request may differ depending upon the type of request, the type, sensitivity and value of the personal information that is the subject of the request, and the risk of harm to you that may occur as a result of unauthorized access or deletion, among other factors. We may also require you to provide a written declaration that you are who you say you are.

Please note that as part of the verification process, once you submit a request to delete, we may follow up and require you to confirm that you want your information deleted.

You may designate an authorized agent to make a request on your behalf by providing the agent with signed written permission to do so. The written permission must state your full legal name, the full legal name of the individual who is the subject of the request, and needs to be clear about the permission granted. Alternatively, you may submit a copy of a power of attorney under Probate Code sections 4000-4465. In either case, please also indicate in your email the nature of your request. The consumer's identity, in addition to the agent's, will need to be independently verified in order for us to be able to fulfill your request. We may also ask the consumer to directly confirm with us that they provided you permission to submit a request. Please keep in mind that if we do not receive adequate proof that you are authorized to act on the consumer's behalf, we may deny the request.

### **Right to Opt Out of the Sale of Personal Information or Sharing for Cross-Context Behavioral Advertising**

Montway does not sell Personal Data to third parties for monetary consideration. However, the collection of data on our behalf by certain of our third-party Site analytics or digital advertising service providers may be considered a "sale" and is considered "sharing" under the CPRA. For example, we use Google Analytics to help us understand how our Site is used. To opt-out of the sale of Personal Information or sharing for cross-context behavioral purposes by Montway, please follow the instructions above.

To disable sharing through cookies set by 3rd parties that may be considered "sales" or "sharing" under the CCPA and CPRA, click the 'Cookie Preferences' link in the footer of our website. In addition, the

Digital Advertising Alliance also offers tools for California consumers to send requests under the CCPA and CPRA to opt out of the sale of personal information by some or all of the participating companies <https://www.privacyrights.info/>.

**Users Younger than Age 18**

Montway does not have actual knowledge that we sell or share Personal Data about individuals younger than the age of 18.

**Right to Limit The Use and Disclosure of Sensitive Personal Information**

Under the CPRA Regulations, a business must only provide the Right to Limit The Use and Disclosure of Sensitive Personal Information when such use is collected or processed for the purpose of inferring characteristics about a consumer, or does not fall under certain statutory exceptions, pursuant to CPRA §1798.121. Montway does not use or disclose Sensitive Personal Information for such purpose and/or its uses fall within the statutory exceptions, and we therefore do not offer this right at this time.

**Personal Information We Collect**

Montway has collected, used, disclosed, sold and shared the following personal data in the preceding 12 months in the “Types of Data we collect” section above. Montway also collects and discloses the Personal Data set forth below for a variety of business purposes as described in the “What do We Do With Your Information” section above.

<b>Categories of Personal Information</b>	<b>Categories of Sources from which Information is Collected</b>	<b>Business or Commercial Purpose(s) for which Information is Collected</b>	<b>Categories of Third Parties to Whom the Information is Disclosed</b>	<b>Categories of Third Parties to Whom the Information is Sold or Shared</b>
Identifiers Name, address, phone numbers, email address, IP address, identification numbers, and online or device identifiers.	We may collect this type of information from:  Consumer, Cookies and Tracking Technologies, Third party social media companies, Third party business partners, including	We may use this type of information for:  To provide the Site and services to you, For Advertising Activities and Marketing Messages, For Personalization, For Internal Business Purposes, For Security,	Service providers, Montway Family of Companies, Third Party Advertising, Analytics, and Similar Third Parties, Third Parties we partner with for contests, sweepstakes, or other promotions, For Legal and Administrative Purposes,	Third party advertising, analytics, and other similar marketing business partners may have access to this data, and this may be considered a “sale” or “share” under CPRA in certain circumstances.

	lead generation companies.	For Legal and Administrative Purposes, As otherwise described in the Privacy Policy, For other purposes disclosed at the time of collection or otherwise with your consent.	Other third parties (including government agencies and law enforcement) as required by law or in connection with court proceedings (such as pursuant to subpoenas or court orders), In connection with a business transfer/change of control, As otherwise described in the Privacy Policy, and When You Direct Us to Share Your Information or With Your Consent.	
<p><b>Categories listed in the California Customer Records statute</b></p> <p>This category includes name, address, and phone number, information about your employment or education, and other categories of information classified as “personal” under this California law.</p>	<p>We may collect this type of information from:</p> <p>Consumer, Cookies and Tracking Technologies, Third party social media companies, Third party business partners, including lead generation companies.</p>	<p>We may use this type of information for:</p> <p>To provide the Site and services to you, For Advertising Activities and Marketing Messages, For Personalization, For Internal Business Purposes, For Security, For Legal and Administrative Purposes, As otherwise described in the Privacy Policy, For other purposes</p>	<p>Service providers, Montway Family of Companies, Third Party Advertising, Analytics, and Similar Third Parties, Third Parties we partner with for contests, sweepstakes, or other promotions, For Legal and Administrative Purposes, Other third parties (including government agencies and law enforcement) as required by law or in connection with court proceedings (such as pursuant</p>	<p>Third party advertising, analytics, and other similar marketing business partners may have access to this data, and this may be considered a “sale” or “share” under CPRA in certain circumstances.</p>

		disclosed at the time of collection or otherwise with your consent.	to subpoenas or court orders), In connection with a business transfer/change of control, As otherwise described in the Privacy Policy, and When You Direct Us to Share Your Information or With Your Consent.	
<p><b>Commercial information</b></p> <p>This category includes, for example, payment information you provide for goods, services, customer service records, and information about the products you have purchased.</p>	<p>We may collect this type of information from:</p> <p>Consumer, Cookies and Tracking Technologies, Third party social media companies, Third party business partners, including lead generation companies.</p>	<p>We may use this type of information for:</p> <p>To provide the Site and services to you, For Advertising Activities and Marketing Messages, For Personalization, For Internal Business Purposes, For Security, For Legal and Administrative Purposes, As otherwise described in the Privacy Policy, For other purposes disclosed at the time of collection or otherwise with your consent.</p>	<p>Service providers, Montway Family of Companies, Third Party Advertising, Analytics, and Similar Third Parties, Third Parties we partner with for contests, sweepstakes, or other promotions, For Legal and Administrative Purposes, Other third parties (including government agencies and law enforcement) as required by law or in connection with court proceedings (such as pursuant to subpoenas or court orders), In connection with a business transfer/change of control, As otherwise described in the Privacy Policy, and</p>	<p>Third party advertising, analytics, and other similar marketing business partners may have access to this data, and this may be considered a “sale” or “share” under CPRA in certain circumstances.</p>

			When You Direct Us to Share Your Information or With Your Consent.	
<p><b>Internet or other electronic network activity information</b></p> <p>This category includes information about the web browser and operating system you are using, the website or ad that referred you to our Site, areas of the Site that you visited, and terms entered into a search engine that led you to the Site.</p>	<p>We may collect this type of information from:</p> <p>Consumer, Cookies and Tracking Technologies, Third party social media companies, Third party business partners, including lead generation companies.</p>	<p>We may use this type of information for:</p> <p>To provide the Site and services to you, For Advertising Activities and Marketing Messages, For Personalization, For Internal Business Purposes, For Security, For Legal and Administrative Purposes, As otherwise described in the Privacy Policy, For other purposes disclosed at the time of collection or otherwise with your consent.</p>	<p>Service providers, Montway Family of Companies, Third Party Advertising, Analytics, and Similar Third Parties, Third Parties we partner with for contests, sweepstakes, or other promotions, For Legal and Administrative Purposes, Other third parties (including government agencies and law enforcement) as required by law or in connection with court proceedings (such as pursuant to subpoenas or court orders), In connection with a business transfer/change of control, As otherwise described in the Privacy Policy, and When You Direct Us to Share Your Information or With Your Consent.</p>	<p>Third party advertising, analytics, and other similar marketing business partners may have access to this data, and this may be considered a “sale” or “share” under CPRA in certain circumstances.</p>
<p><b>Audio and Visual information</b></p> <p>This category includes, for example, voice</p>	<p>We may collect this type of information from:</p>	<p>We may use this type of information for:</p>	<p>Service providers, Montway Family of Companies, Third Parties we partner with for contests,</p>	<p>We do not “sell” or “share” this category of data.</p>



<p>recordings when you call into customer service.</p>	<p>Consumer.</p>	<p>To provide the Site and services to you, For Internal Business Purposes, For Security, For Legal and Administrative Purposes, As otherwise described in the Privacy Policy, For other purposes disclosed at the time of collection or otherwise with your consent.</p>	<p>sweepstakes, or other promotions, For Legal and Administrative Purposes, Other third parties (including government agencies and law enforcement) as required by law or in connection with court proceedings (such as pursuant to subpoenas or court orders), In connection with a business transfer/change of control, As otherwise described in the Privacy Policy, and When You Direct Us to Share Your Information or With Your Consent.</p>	
<p><b>Inferences drawn from any of the information identified above to create a profile about a consumer</b></p> <p>These inferences may relate to your perceived interests, preferences, characteristics, or behavior.</p>	<p>We may collect this type of information from:</p> <p>Consumer, Cookies and Tracking Technologies, Third party social media companies, Third party business partners, including lead generation companies.</p>	<p>We may use this type of information for:</p> <p>To provide the Site and services to you, For Advertising Activities and Marketing Messages, For Personalization, For Internal Business Purposes, For Security, For Legal and Administrative Purposes,</p>	<p>Service providers, Montway Family of Companies, Third Party Advertising, Analytics, and Similar Third Parties, Third Parties we partner with for contests, sweepstakes, or other promotions, For Legal and Administrative Purposes, Other third parties (including government agencies and law enforcement) as</p>	<p>Third party advertising, analytics, and other similar marketing business partners may have access to this data, and this may be considered a “sale” or “share” under CPRA in certain circumstances.</p>

		As otherwise described in the Privacy Policy, For other purposes disclosed at the time of collection or otherwise with your consent.	required by law or in connection with court proceedings (such as pursuant to subpoenas or court orders), In connection with a business transfer/change of control, As otherwise described in the Privacy Policy, and When You Direct Us to Share Your Information or With Your Consent.	
--	--	--	---	--

### **Data Retention**

Montway will retain all categories of personal data described above for as long as reasonably necessary to fulfill the purpose for which it was collected, allow you to exercise the choices and rights you requested, comply with our contractual obligations, enforce our policies, or as required by applicable laws or regulation.

### **Notice of Financial Incentive**

Under California regulations, certain programs we offer that provide benefits to consumers may be considered financial incentive programs. We may collect personal information from you in connection with these programs, e.g., such as contact information (name, email address, phone number) and certain commercial information (e.g., transaction history) for a number of reasons, including to administer the program, contact you with regard to your account (if any), to provide the benefits to you, to better serve you, and to fulfill your requests associated with the program.

To opt into the programs, you may need to provide certain information, register for an account and agree to the applicable program terms, or otherwise follow the instructions associated with that applicable program. Please also see the terms of the program you are joining for additional description of the program and any additional requirements. Participation in our loyalty or other similar programs is voluntary and you can withdraw at any time. To withdraw from the loyalty or other programs, please email [privacy@montway.com](mailto:privacy@montway.com).

To the extent that we provide a program that may be considered a financial incentive because the program is directly or reasonably related the collection, deletion or sale or retention of consumer personal information, the value is reasonably related to the overall value we receive from the personal information participants provide specific to the program minus the costs and expenses we incur in providing the program.

## **Do Not Track**

Do Not Track is a privacy preference that you can set in your web browser to indicate that you do not want certain information about your webpage visits collected across websites when you have not interacted with that service on the page. Because there is not yet an accepted standard for how to respond to browser DNT signals, our Site does not currently take any action when it receives a Do Not Track request. For details, including how to turn on Do Not Track, visit [www.donottrack.us](http://www.donottrack.us).

## ***Other California Rights / Your California Privacy Rights***

Montway does not share personal information with third parties for their direct marketing purposes (as defined by California Civil Code Section 1798.83) unless we give you choice (to opt in or opt-out) before sharing with those third parties.

If you are a California consumer and you have questions about our practices with respect to sharing information with third parties for their direct marketing purposes and your ability to exercise choice, please send your request by email to [privacy@montway.com](mailto:privacy@montway.com). You must put the statement "Your California Privacy Rights" in the subject field of your email. You must include your name, street address, city, state, and ZIP code. We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

## **Notice to International Users**

Your Personal Data may be collected, transferred to and stored by us in the United States and by our affiliates in other countries where we operate. Therefore, your Personal Data may be processed outside the European Economic Area (EEA), and in countries which are not subject to an adequacy decision by the European Commission and which may not provide for the same level of data protection as the EEA. In this event, we will ensure that the recipient of your Personal Data offers an adequate level of protection, for instance by entering into standard contractual clauses for the transfer of data as approved by the European Commission (Art. 46 GDPR), or we will ask you for your prior consent to such international data transfers.

## **EEA/UK/Switzerland Residents**

**If you are a resident of the European Economic Area (EEA), the United Kingdom (UK), or Switzerland, the following information applies.**

**Data Subject Rights:** You have certain rights relating to your Personal Data, subject to local data protection laws. Depending on the applicable laws and, in particular, if you are located in the EEA, UK, or Switzerland these rights may include:

- To access your Personal Data held by us, including information about its sources, purposes, and sharing (right to access);
- To rectify inaccurate Personal Data and, taking into account the purpose of processing the Personal Data, ensure it is complete (right to rectification);
- To erase/delete your Personal Data, to the extent permitted by applicable data protection laws (right to erasure; right to be forgotten) Please note that we may have a reason to deny your

deletion request or delete data in a more limited way than you anticipated, e.g., because of a legal obligation or right to retain it;

- To restrict our processing of your Personal Data if you are (1) contesting the accuracy of your personal data, (2) asserting that our processing is unlawful; (3) asserting that we no longer need to keep the data for reasons related to the establishment, exercise, or defense of legal claims, or you object to our processing, and as otherwise permitted by law (right to restriction of processing);
- To transfer your Personal Data to another entity, to the extent possible (right to data portability);
- To object to any processing of your Personal Data carried out on the basis of our legitimate interests (right to object). If we process your Personal Data for direct marketing purposes or share it with third parties for their own direct marketing purposes, you can exercise your right to object at any time to such processing without having to provide any specific reason for such objection;
- Not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects on you (“Automated Decision-Making”). Automated Decision-Making currently does not take place on our Sites; and
- To the extent we base the collection, processing and sharing of your Personal Data on your consent, to withdraw your consent at any time (right to withdraw consent), without affecting the lawfulness of the processing based on such consent before its withdrawal.

You also have the right to lodge a complaint with a supervisory authority. Contact details for data protection authorities are available at the following links. EEA:

[https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en), UK: <https://ico.org.uk/>, Switzerland:

[https://www.edoeb.admin.ch/edoeb/en/home/deredoeb/kontakt/anzeigeformular\\_betroffene.html](https://www.edoeb.admin.ch/edoeb/en/home/deredoeb/kontakt/anzeigeformular_betroffene.html).

If you wish to exercise any of the rights above, please contact us at [privacy@montway.com](mailto:privacy@montway.com) or at (888) 497-9792.

**Verification Procedures:** We must verify your identity for everyone’s protection, so we may require you to provide us with verification information prior to accessing any records containing personal data about you. We do this by asking you to provide personal identifiers we can match against information we may have collected from you previously and confirm your request using the email or telephone account stated in the request. We will use the data you provide for verification only for the purpose of verification. We may have a reason under the law why we do not have to respond to your request or respond to it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

**Purposes of processing and legal basis for processing:** As explained above, we process Personal Data in various ways depending upon your use of the Site, including: (1) to pursue our legitimate business interest to operate the Site and provide our services as more specifically described in the section titled “What do we do with Your Information” above; (2) with your consent; and (3) as necessary for our legitimate interests in providing the Site where those interests do not override your fundamental rights and freedoms related to data privacy. To learn more about with whom we share your Personal Data please refer to the section titled “Our Disclosure to Third Parties” above.

**Transfers:** Personal data we collect may be transferred to, and stored and processed in, the United States or any other country in which we or our affiliates or subcontractors maintain facilities. We ensure that

transfers of personal data to a third country or an international organization are subject to appropriate safeguards as described in the GDPR.

**Retention:** We will retain your Personal Data for as long as necessary to fulfill the purpose for which it was collected, or as required by applicable laws or regulation. Copies of information that you have updated, modified, or deleted will remain in our systems if applicable law requires us to retain it.