

# Privacy Statement for MOL Logistics (USA), Inc.

MOL Logistics is committed to protecting and respecting your privacy. In this privacy statement, we explain how we use your any personal information we collect about you when you use our wider services.

A Data Controller is the person or organization that determines the purposes for which and the manner in which any personal data is processed. For these purposes, we, MOL Logistics (USA) Inc., 380 North Broadway, Suite 202 Jericho, NY 11753, USA, are the Data Controller.

## **WHAT INFORMATION WE COLLECT AND HOW WE USE IT**

"Personal Information" is information that, either alone or in combination with other information collected, identifies an individual. When we combine other information (*i.e.*, information that does not, on its own, identify an individual) with Personal Information, we treat the combined information as Personal Information. Personal Information includes your name, mailing address, phone number, e-mail address, employer, and job function.

As a freight forwarding and logistics services business, we collect Personal Information about you, such as your name, address, contact details and identification paperwork, when you register with us, place an order with us for any of our services or otherwise are in touch with us regarding our services. We may also keep information contained in any correspondence you may have with us by telephone, post, email or other communication.

Our legal bases for handling this data are to enable us to perform a contract with you (our services requiring us to arrange the means of transport, issue transport documents and carry out customs clearances) and in addition, processing the data is necessary for the purposes of our legitimate interests in ensuring you receive our freight forwarding and logistics services you have asked to receive from us.

Where we may be obliged to collect any personal information that is deemed to be sensitive personal data, we will only process this with your explicit consent for us to do so.

## **HOW WE USE YOUR INFORMATION**

We will only use the Personal Information you provide to us in order to answer your questions and provide the freight handling and logistics services you request from us.

### *Contact and Mailing Information*

When you contact us or contract with us to provide services to you or your company, we request your contact information, including your name, mailing address, phone number, and email address. Depending on the type of service you are requesting, we may also request other information that is required for shipping, customs, export, or other related documentation. This information is necessary for us to provide you with the services you are requesting. When a company requests our services, we may still need certain Personal Information about officers or points of contact at

the company, including names, position/title, and email address.

Sometimes, when companies submit information to us as part of the shipping process or otherwise related to our services, the information we receive may include limited Personal Information about those companies' employees or officers. This Personal Information may include the name and position of persons who are signing documents on behalf of a company, as well as the names, email address, phone numbers, and office addresses for employees who are sending information to us or another party to the transaction.

We only request information about individuals as part of our services or transactions if that information is necessary for us to process the shipment or fulfill the order. For example, this information may be required for:

- Signatures on authorization or power of attorney forms that allow us to undertake services and perform activities on a company's behalf;
- Processing ACH, business credit, or customs bond applications for companies that are customers or prospective customers; or
- Other forms, authorizations, or documentation necessary for us to engage in the activity requested by our customers.

This information is also necessary for us to communicate with you about your account with us, giving you important information about your services (*e.g.*, shipments), sending you notices about material changes to this Privacy Statement, and, sending you updates on the status of your account, shipments, and other information related to the services you have requested from us.

#### *Payment Information*

When you ask to purchase a service, we request certain payment information necessary for us to fulfill your order. This information may include your billing address, and other bank information.

If you send us payment by mail, email, or telephone, we will collect Personal Information from you including, your name, mailing address, telephone number, and your payment information in order to process your payments for the products and services you request.

#### *Communicating with Us*

As explained above, when you communicate with us by email, phone, facsimile, or mail, we keep a record of your correspondence or comments, including Personal Information, in a file specific to you. We may use this information to help us provide you with the services you request.

In addition, while providing services to our customers and partners, we may occasionally receive forwarded emails from other parties to the transaction that contain your emails, including Personal Information such as your name, email address, and other information you include on your signature line. We do not process this Personal Information except to the extent necessary to complete transactions on behalf of our customers and partners.

## *Consent*

If we ever request additional Personal Information for different reasons or in a situation that requires your explicit consent, we will notify you of the reasons and request your explicit consent to the collection accordingly.

We collect certain Personal Information when you visit our website or click on the various links for products and services. We collect this information to help run our website more efficiently, to gather broad demographic information, and to monitor the level of activity on the Site. The personally identifiable data we collect when you visit the website may include the Uniform Resource Locator (“URL”) of the website that you came from before visiting our website, which pages you visit on our website, which URL you next go to, which browser you used to come to our website, your platform, your user name, your Internet Protocol (“IP”) address, and any search terms entered on our website. We use industry-accepted standards and technology to collect this data and also take reasonable and up-to-date measures to maintain the security and integrity of collected data.

## **SOURCE OF DATA**

We primarily collect Personal Information directly from you. In some cases, however, we may receive your Personal Information, such as your Contact and Mailing Information, from third-parties or our affiliates as part of the freight handling or logistics services you have requested from them.

## **SHARING YOUR INFORMATION**

We do not sell, trade, or rent to others the Personally Information we collect from you.

Our work for you may require us to pass your information to companies within our group and to third parties as described below. The information will be provided solely for the purposes of completing tasks and providing our services to you and we require those third parties to keep secure your Personal Data so that they may not use it for their own direct marketing purposes. These third parties may be:

- Any third party contractors (and any of their sub-contractors) that provide a service to us or act as our agents on the understanding they keep the information confidential;
- Border/customs controls for clearance in the destination countries;
- Our professional advisers;
- Credit reference agencies and other companies for use in credit decisions, for fraud prevention and to pursue debtors on the understanding they keep the information confidential;
- Insurance companies or regulatory authorities so as to comply with any legal and regulatory issues and disclosures; and

- Government agencies or offices and/or to satisfy any regulatory request if we have a duty to do so or if the law allows us to do so;

We will only use this information subject to your instructions, data protection law and our duty of confidentiality.

If in the future we intend to process data for a purpose other than that for which it was originally collected, we will provide you with information on that purpose and any other relevant information.

We do not use your information for marketing purposes except as a resource to help us understand your needs in the event that you schedule a consultation with us for future services.

#### *Other Disclosures*

We may disclose Personal Information about you to others if we have your consent to do so in such form of consent as may be required under applicable law.

We may also disclose Personal Information about you to others as we believe to be necessary or appropriate: (a) under applicable law or regulation, including laws or regulations outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public authorities and law enforcement officials, including officials outside your country of residence; (d) to assist or support theft investigations involving our products or property, (e) to enforce any of our terms and conditions or policies; (f) to protect our operations or those of any of our affiliates and subsidiaries; (g) to protect the rights, privacy, safety or property of BRPT, its affiliates and subsidiaries, you or others; or (h) to permit us to pursue available remedies or limit the damages that we may sustain.

We may also transfer Personal Information to an affiliate, a subsidiary or a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business or assets, including, without limitation, in connection with any bankruptcy or similar proceeding.

### **RETENTION OF PERSONAL INFORMATION**

We will retain your Personal Information for the period necessary to fulfill the purposes for which your Personal Information has been collected as outlined in this Privacy Statement unless a longer retention period is required by law.

### **INTERNATIONAL TRANSFERS**

MOL Logistics (USA), Inc. is based in the United States, where our servers, data processors, and offices are located. Please note that any information you send to us by telephone, email, mail, or our website will be received in the United States. The United States may not have the same data protection laws as the country in which you initially provided the information.

### **HOW YOU CAN REVIEW, CORRECT, UPDATE, AND DELETE YOUR PERSONAL INFORMATION**

We take reasonable steps to help ensure that the Personal Information we collect from you is accurate, complete and current.

If you are located in the European Union, you have specific rights related to the processing of your data. Specifically, you may request **access** to your Personal Information and request that erroneous or inaccurate Personal Information be **corrected**. You may request that your Personal Information (including certification information) and your website account be **deleted**. You may also request a **copy** of your Personal Information in our files. You can **object** to the processing of your data and, if you provided consent to allow us to process your data, you can **withdraw your consent**. We will respond promptly to your requests in accordance with applicable law.

If you are located outside the European Union, we will strive to respond to your requests in a manner consistent with applicable law.

For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We may decline to process requests that jeopardize the privacy of others, are extremely impractical, or would cause us to take any action that is not permissible under applicable laws. Additionally, as permitted by applicable laws, we may need to retain certain Personal Information for a longer period of time for recordkeeping purposes, such as retaining records related to imports or exports as required by U.S. law.

Access, correction or deletion requests can be sent to us by email or postal mail as follows:

Name: General Manager, IT  
Email: [mlghelp@mol-logistics.com](mailto:mlghelp@mol-logistics.com)  
Mail: 380 N. Broadway  
Suite 202  
Jericho, NY 11753

If you are in the European Union (“EU”), you have the right to contact your supervisory authority to lodge a complaint regarding if you have any issues with how we are processing your data.