

California Consumer Privacy Notice

Effective Date: January 1, 2023

This Privacy Notice (“**Notice**”) is provided pursuant to the California Consumer Privacy Act, as amended (“**CCPA**”) and describes how KKW Holdings, Inc., its subsidiaries and affiliates, including KKW Trucking, Inc., The Complete Logistics Company, and RedRox Logistics LLC (“**KKW**,” “**Company**,” “**us**,” “**we**,” or “**our**”) processes Personal Information of California consumers.

As used in this Notice, the term “**Personal Information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal Information does not include information that is publicly available, de-identified, or aggregated, or otherwise exempted by the CCPA.

Unless otherwise noted, the disclosures herein cover our activities in the twelve (12) months preceding the Effective Date, as well as our current practices.

I. Collection, Use, and Disclosure of Personal Information

KKW may collect, use, and disclose the following categories of Personal Information for business purposes consistent with applicable laws as identified below. Where KKW discloses applicable Personal Information to recipients, such as our service providers, it does so for the same business purposes described below. These examples may vary depending on the nature of your interactions with us.

Category of Personal Information	Business Purposes for Collection, Use, or Disclosure	Categories of Recipients to whom Personal Information is Disclosed for a Business Purpose
<p>Identifiers, including name, title, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, driver’s license number, social security number, or other similar identifiers</p>	<ul style="list-style-type: none"> ● To provide and maintain our website, including to monitor the usage of the websites; ● To process your orders and any refunds; ● To maintain your accounts with us; ● To communicate with you, including about our services, updates to our terms and policies, and to obtain your feedback; ● To perform a credit check; ● Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes; and ● To detect and prevent fraud against you and/or us. 	<ul style="list-style-type: none"> ● Data analytics providers; ● Payment processors; ● Shipping and logistics providers; ● Security providers; ● Credit bureaus; ● Information technology vendors; and ● Service providers.
<p>Personal information described in Cal. Civ. Code § 1798.80(e), including name, signature, physical characteristics or description, address, telephone number, driver’s</p>	<ul style="list-style-type: none"> ● To provide and maintain our website, including to monitor the usage of the websites; ● To process your orders and any refunds; 	<ul style="list-style-type: none"> ● Data analytics providers; ● Payment processors; ● Shipping and logistics providers;

Category of Personal Information	Business Purposes for Collection, Use, or Disclosure	Categories of Recipients to whom Personal Information is Disclosed for a Business Purpose
license or state identification card number, social security number, employment, insurance policy information, payment information, or other financial information	<ul style="list-style-type: none"> • To maintain your accounts with us; • To communicate with you, including about our services, updates to our terms and policies, and to obtain your feedback; • To perform a credit check; • Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes; and • To detect and prevent fraud against you and/or us. 	<ul style="list-style-type: none"> • Service providers who help us to place relevant advertisements; • Security providers; • Credit bureaus; • Information technology vendors; and • Service providers.
Commercial information , including records services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	<ul style="list-style-type: none"> • To process your orders and any refunds; • To maintain your accounts with us; • Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes; and • To detect and prevent fraud against you and/or us. 	<ul style="list-style-type: none"> • Data analytics providers; • Payment processors; • Shipping and logistics providers; • Security providers; • Information technology vendors; and • Service providers.
Internet or other electronic network activity information , including internet or other similar activity, browsing history, search history, information on a consumer's interaction with a website, or social media account information	<ul style="list-style-type: none"> • To provide and maintain our website, including to monitor the usage of the websites; • To process your orders and any refunds; • To maintain your accounts with us; • Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes; and • To detect and prevent fraud against you and/or us. 	<ul style="list-style-type: none"> • Data analytics providers; • Information technology vendors; and • Service providers.
Geolocation data , including location inferred from your IP address	<ul style="list-style-type: none"> • To provide and maintain our website, including to monitor the usage of the websites; and • Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes. 	<ul style="list-style-type: none"> • Data analytics providers; • Security providers; • Information technology vendors; and • Service providers.
Sensory information , including consumer voicemails, and security camera footage	<ul style="list-style-type: none"> • To provide you with customer service; and • To improve our services. 	<ul style="list-style-type: none"> • Data analytics providers; • Information technology vendors; and • Service providers.
Professional or employment-related information , including your employer and title,	<ul style="list-style-type: none"> • To provide you with customer service; • To improve our services; and 	<ul style="list-style-type: none"> • Data analytics providers; • Payment processors; • Shipping and logistics providers;

Category of Personal Information	Business Purposes for Collection, Use, or Disclosure	Categories of Recipients to whom Personal Information is Disclosed for a Business Purpose
professional licenses, and certifications <i>If you are a California KKW workforce member, please contact us for additional disclosures. California KKW job applicants can find additional disclosures here [https://www.kkwtrucks.com/ccpa/].</i>	<ul style="list-style-type: none"> • Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes. 	<ul style="list-style-type: none"> • Information technology vendors; and • Service providers.
Personal Information that does not fit directly within one of the categories defined by the CCPA, including the contents of communications you send to us by phone, email, text, online chat etc.	<ul style="list-style-type: none"> • To communicate with you including about our services, updates to our terms and policies, and to obtain your feedback; • To provide you with customer service; • To improve our services; and • Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes. 	<ul style="list-style-type: none"> • Information technology vendors; and • Service providers.

In addition, we may receive and collect additional categories or examples of information from you that you may provide on a voluntary basis which we would not otherwise request or collect. For example, information you provide to us in communications.

II. Collection, Use, and Disclosure of Sensitive Personal Information

KKW may collect, use, and disclose the following categories of sensitive Personal Information for business purposes consistent with applicable laws as identified below. Where KKW discloses applicable sensitive Personal Information to recipients, such as our service providers, it does so for the same business purposes described below. These examples may vary depending on the nature of your interactions with us.

Category of Sensitive Personal Information	Business Purposes for Collection, Use, or Disclosure	Categories of Recipients to whom Sensitive Personal Information is Disclosed for a Business Purpose
Personal Information that reveals a consumer’s Social Security, driver’s license, state identification card, or passport number	<ul style="list-style-type: none"> • To process your orders and any refunds; • To maintain your accounts with us; • To perform a credit check; • Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes; and • To detect and prevent fraud against you and/or us. 	<ul style="list-style-type: none"> • Data analytics providers; • Payment processors; • Shipping and logistics providers; • Security providers; • Credit bureaus; • Information technology vendors; and • Service providers.
Personal Information that reveals a consumer’s precise geolocation (location within a radius of 1,850	<ul style="list-style-type: none"> • Auditing, research and analysis, to maintain and improve our 	<ul style="list-style-type: none"> • Data analytics providers; • Payment processors;

Category of Sensitive Personal Information	Business Purposes for Collection, Use, or Disclosure	Categories of Recipients to whom Sensitive Personal Information is Disclosed for a Business Purpose
feet), in limited circumstances when you are aware of the collection	services, and for any other internal business purposes.	<ul style="list-style-type: none"> • Shipping and logistics providers; • Security providers; • Credit bureaus; • Information technology vendors; and • Service providers.

III. Disclosing Personal Information

We may disclose each of the categories of Personal Information identified above to the respectively identified categories of recipients for operational or business purposes consistent with the purposes for collection or use designated, as is reasonably necessary and proportionate to achieve those purposes, or for another purpose that is compatible with the context in which the personal information was collected, including, but not limited to:

- Helping to ensure security and integrity of your Personal Information;
- Debugging, repairing, and improving functionality;
- Short-term, transient use;
- Performing services on our behalf;
- Providing advertising and marketing services, except for cross-context behavioral advertising;
- Internal research for technological development; and
- Verifying the quality and/or safety of our devices.

In addition to the other purposes for collection, use, and disclosure of Personal Information described in this Notice, we may collect, use, and disclose Personal Information as required by law, regulation or court order; to respond to governmental and/or law enforcement requests; to identify, contact or bring legal action against someone who may be causing injury to or interfering with our or others' rights or property; to support any actual or threatened claim, defense or declaration in a case or before any jurisdictional and/or administrative authority, arbitration or mediation panel; in connection with disciplinary actions/investigations; or to conduct auditing. Likewise, we may use and disclose Personal Information to other parties in connection with the sale, assignment, merger, reorganization, or other transfer.

IV. Sources of Personal Information

We may collect your Personal Information from the following sources:

- **Directly from you.** For example, when you provide us information online, through electronic forms, over the phone, or through paper documents.

- **Automatically through our websites.** For example, via cookies and other tracking technologies.
- **From our service providers.** For example, vendors and suppliers, or other individuals and businesses.
- **From other external sources.** For example, social media pages, and data providers.
- **From public sources of data.** For example, government databases.

We may also collect publicly available information about you, including information that is lawfully made available to the general public from federal, State, or local government records.

V. Selling or Sharing Personal Information

We do not sell Personal Information or share it for cross-context behavioral advertising. We do not have actual knowledge that we sell or share the Personal Information of consumers under sixteen (16) years of age.

VI. How Long We Keep Personal Information

We generally maintain Personal Information according to our retention obligations and policies, operational business purposes, and other legal and regulatory requirements. We discard this Personal Information when reasonably practicable.

We keep the categories of Personal Information described above for as long as is necessary for the purposes described in this Notice or otherwise authorized by law. This generally means holding the information for as long as one of the following apply:

- Your Personal Information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected it;
- Your Personal Information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which it was collected;
- Your Personal Information is reasonably required to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case);
- We are otherwise required or permitted to keep your Personal Information by applicable laws or regulations.

Where your Personal Information is used for more than one purpose, we will retain it until the purpose with the latest period expires.

VII. Submitting Requests Relating to Your Personal Information

If you are a resident of California, you have the right to submit certain requests relating to your Personal Information as described below. To exercise any of these rights, please submit a request to PCN@kkwtrucks.com or call us toll-free at 1-800-955-4559. Please note that if you submit a request to know, request to delete, or request to correct, you will be asked to provide two-to-three (2-3) pieces of Personal Information that we will match against our records to verify your identity. You may designate an authorized agent to make a request on your behalf;

however, you will still need to verify your identity directly with us before your request can be processed.

Right to Know. You have the right to know what Personal Information we have collected about you, which includes:

- (1) The categories of Personal Information we have collected about you, including;
 - a. The categories of sources from which the Personal Information was collected;
 - b. Our business purposes for collecting or disclosing Personal Information;
 - c. The categories of recipients to which we disclose Personal Information;
 - d. The categories of Personal Information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of Personal Information.
- (2) The specific pieces of Personal Information we have collected about you.

Right to Delete Your Personal Information. You have the right to request that we delete Personal Information we collected from you, subject to certain exceptions.

Right to Correct Inaccurate Information. If you believe that Personal Information we maintain about you is inaccurate, you have the right to request that we correct that information.

Right to Opt Out of Sales and Sharing of Personal Information. We do not sell Personal Information or share it for cross-context behavioral advertising.

Right to Limit Use and Disclosure of Sensitive Personal Information. We do not use or disclose sensitive Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA.

Right to Non-Discrimination for the Exercise of Your Privacy Rights. If you choose to exercise any of your privacy rights under the CCPA, you also have the right not to receive discriminatory treatment by us.

VIII. California “Shine the Light”

California's “Shine the Light” law permits California residents to request certain information regarding our disclosure of Personal Information to third parties for their own direct marketing purposes. We do not share Personal Information with third parties for those third parties' own direct marketing purposes. Californians may request information about our compliance with this law by contacting us as provided below.

IX. Analytics

Some of our websites use analytics technology provided by Google Analytics to understand how users interact with the site, improve our web experience, and better market our services. Google Analytics uses cookies and other tracking technologies to collect information about how you use the website. Personal Information collected by Google Analytics (e.g., your IP address and other usage information) may be transmitted to and stored by Google on servers in the U.S. (or

elsewhere). You may exercise choices regarding the use of cookies from Google Analytics by going to <https://tools.google.com/dlpage/gaoptout> or downloading the Google Analytics Opt-out Browser Add-on.

X. Chat Function

Some of our websites offer an online chat feature that is supported by Paradox. When you use this feature, you may be disclosing information you provide in the chat to Paradox as well as to us. For more information about how Paradox processes your Personal Information, please review their privacy policy [here](#).

XI. Social Media Features

We may collect Personal Information that you share publicly on Facebook or that is part of your Facebook profile and that you allow Facebook to share with us. We receive your Facebook profile data when you use Facebook Connect, or when you interact with us on Facebook. To learn more about how we obtain Personal Information from Facebook, or to opt out of the disclosure of such data, please review Facebook's privacy policy or update your Facebook account settings.

XII. How to Contact Us

If you have any questions, please contact us at:

Phone: 1-800-955-4559

Email: PCN@kkwtrucks.com