

Privacy Policy and Data Protection Rights**PRIVACY POLICY AND DATA PROTECTION RIGHTS**

[INTERNATIONAL LOGISTICS SOLUTIONS (ILS) ("INTERNATIONAL LOGISTICS SOLUTIONS (ILS)"], "we" or "us") value your privacy. This Privacy Policy applies to our website <https://ilsols.com/site/> as well as the Services, which can be accessed through the Site. Therefore, this privacy policy (the "Privacy Policy") aims to inform you about how the company's Group entities, acting as data controllers, collect and process the personal data you submit or disclose to us. We also act as data controllers when we process your personal data received or obtained through a third party. **In this Privacy Policy ("Policy"), we describe how we collect, use, and disclose the information we obtain about visitors to our Site and users of our Services.**

By visiting the Site or using our Services, you agree that your personal information will be handled as described in this Policy. Your use of our Site and Services and any privacy disputes are subject to this Policy and our Terms of Service, including its applicable limitations on damages and dispute resolution.

We encourage you to read this Privacy Policy carefully. If you do not wish for your personal data to be used by us as set out in this Privacy Policy, please do not provide us with your personal data. Please note that, in this case, we may not be able to provide you with our services, you may not have access to and/or use some features of the Site, and your customer experience may be affected.

WHAT ARE YOUR DATA PROTECTION RIGHTS?

We would like to make sure you are fully aware of all your data protection rights. Every user has the right to:

- ✓ **The right to access:** You have the right to request copies of your personal data from Our Company.
- ✓ **The right to rectification:** You have the right to request that our company correct any information you believe is inaccurate. You also have the right to request that Our Company complete information you believe is incomplete.
- ✓ **✓ The right to erasure:** You have the right to request that our company erase your personal data, under certain conditions.
- ✓ **✓ The right to restrict processing:** You have the right to request that Our Company restrict the processing of your personal data, under certain conditions.
- ✓ **✓ Right to object to processing:** You have the right to object to Our Company's processing of your personal data, under certain conditions.
- ✓ **✓ The right to data portability:** You have the right to request that our company transfer the data we have collected to another organization, or directly to you, under certain conditions.

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If you make a request, we have one month to respond to you. If you wish to exercise any of these rights, please contact us at our email: Dcomercial@hascompanies.com

HOW WE USE THE INFORMATION WE COLLECT

We use the information we collect about you or that you provide to us, including personal data:

- To present our website and its content to you.
- To register and maintain your account with us.
- To provide and improve the products and services we offer you.
- To provide you with information, products, or services that you request from us.
- To administer surveys and promotions.
- To process, fulfill, and administer transactions and orders for products and services requested by you.
- To contact you in response to a request.
- To improve and enhance our website and applications.
- To fulfill any other purpose for which you provide it.
- To fulfill our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our website, our application, or any products or services we offer or provide through them.
- • In any other way we may describe when you provide the information and for any other purpose with your consent.

LEGAL BASIS FOR PROCESSING

We generally process personal information provided by visitors through our website on the basis of consent.

We may also process personal information on other bases permitted by GDPR and applicable laws, such as when processing is necessary for us to comply with our legal obligations.

INFORMATION WE COLLECT

As you use the Site or Services, certain cookies may passively collect certain information, such as URLs (Uniform Resource Locators) and third-party tracking services, which include:

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CATEGORIES OF PERSONAL INFORMATION

We process the following information when our website visitors voluntarily provide it:

INFORMATION	PURPOSE	NOTES
Name	Required information: necessary to complete transactions	
Last name	Required information: necessary to complete transactions	
Date of birth	Required information: necessary to complete transactions and for verification purposes.	
Gender	Required information: necessary to complete transactions	May be a requirement for some products/services
Email Address	Required information: necessary to complete transactions and also for communications as needed	
Identification (preferably passport)	Required information: necessary to complete transactions and for verification purposes.	
Country of residence	Required information: necessary to complete transactions and for verification purposes.	
Mailing address	You may need to complete transactions	May be a requirement for some products/services
Phone Number (mobile phone number preferred)	Required information: necessary to complete transactions and also	User may choose to receive the link to download contracted services at the phone number registered with us

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	for communications as needed	
Health information	Some offered products may require this information and are also necessary to complete transactions	May be a requirement for some products/services
Additional contact information	We collect information from family members, partners, friends to be contacted in case of emergency	Name, email address and/or phone number

We also process automatically collected information as described in our cookies section of this document.

SITE ACTIVITY INFORMATION

We may track some of the actions you take on the Site, such as the content of searches you perform on the Site.

IP ADDRESSES

IP addresses are collected, which we treat as personal data. The full IP address is captured in application logs but is deleted after 90 days. A truncated version of the IP address (i.e., the last octet discarded) and one-way hashed IP addresses are securely transmitted to the U.S. for use in preparing customer analysis reports.

IP addresses can be used to help determine geolocation at the city, town, country, or DMA level.

IP addresses are anonymized (ip-masking) and used for statistical purposes; evaluation of IP addresses related to a person is impossible.

ACCESSING DEVICE AND BROWSER INFORMATION

When you access the Site from a computer or other device, we may collect anonymous information from that device, such as your Internet Protocol address, browser type, connection speed, and access times (collectively, "Anonymous Information").

MOBILE SERVICES

We may collect non-personal information from your mobile device or computer. This information is often used to help us provide you with the most relevant information. Examples of information that may be collected and used include how you use the application(s) and information about the type of device or computer you use. Additionally, in the event that our application(s) crash on your mobile device, we will receive information about your mobile device model, software version, and device carrier, which allows us to identify and correct errors and improve the performance of our application(s).

ANALYTICS TOOLS

In accordance with Article 6, paragraph 1, letter a of the GDPR, we use Google Analytics, a service of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA,

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(«Google»). In this context, pseudonymized user profiles are created and cookies are used (as described in clause 10). The information stored by the cookie, such as browser type/version, operating system, referrer URL (the previously visited website), hostname of the accessing device (IP address), and timestamp of the server request, is transferred to a server operated by Google for storage.

The information generated in connection with our website is used to create reports on platform usage, to improve our website, and to tailor our services to your needs. We use tools such as Google Analytics to help analyze how users use the Site.

These third parties may use cookies, APIs, and SDKs in our services to enable them to collect and analyze user and device-related data and information on our behalf.

Google Analytics uses cookies to collect information such as how often users visit the Site, what pages they visit, and what other websites they used before entering the Site. We use the information we obtain to improve our Site and our Services.

STATISTICS

The website uses a minimal compilation of Google Analytics, a service that transmits website traffic data to Google servers in the United States and allows us to observe trends to improve the user experience on our website. This minimal compilation processes personal data such as: the unique user ID set by Google Analytics, date and time, title of the page being viewed, URL of the page being viewed, URL of the page viewed before the current page, screen resolution, time in local time zone, files clicked and downloaded, links clicked on an external domain, device type, and country, region, and city.

You can disable this tracking at any time by activating the "Do Not Track" setting in your browser.

Although Google Analytics plants a persistent cookie in your web browser to identify you as a unique user the next time you visit the Site, the cookie cannot be used by anyone other than Google. Google's ability to use and share information collected by Google Analytics about your visits to the Site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can prevent Google Analytics from using your data by downloading and installing the Google Analytics opt-out add-on for browsers, available at <https://tools.google.com/dlpage/gaoptout/>

HOW WE PROTECT YOUR PERSONAL DATA

We use reasonable security procedures to protect against accidental unauthorized or unlawful access, processing, disclosure, alteration, destruction, or accidental loss of your personal data. We limit access and use of your personal data to authorized persons. When your personal data is no longer necessary, we will securely destroy it.

IMPORTANT SETTINGS

When we use the term "Personal Information" in this Privacy Policy, we refer to information about you that personally identifies you, such as your contact information (e.g., name, address, email address, or phone number), personally identifiable medical or health information ("Health Information"), and any other non-public information associated with that information.

When we use the term "Anonymized Information", we refer to information that is not used or intended to be used to personally identify an individual. When we use the term "Cookies", we refer to the small pieces of information that a Site sends to your browser

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while you are viewing a website.

CHILDREN UNDER 18

We do not knowingly collect or process information about children under eighteen (18) years of age without the permission and consent of their parents or guardians. If we discover that we have directly collected and processed the personal data of a child under eighteen (18) years of age, or the equivalent minimum age according to the jurisdiction in question, we will take steps to delete the information as soon as possible. If you become aware that a child under eighteen (18) years of age has directly provided personal data to us, please contact us immediately through the contact address specified in this Privacy Policy. Only their parents or guardians can create accounts for platform use.

YOUR EMAIL ADDRESS

Email address information is collected only when a user communicates with us by email or when the user voluntarily offers such information, such as in a survey and/or website registration. If you do not wish to receive information from us by email, please let us know by checking the appropriate box on any of our contact forms or by contacting us at the address shown above.

YOUR PHONE NUMBER

If you provide us with your phone numbers online, you will only receive telephone contact from us with information regarding your connection or to provide you with the services you have performed online.

COOKIES

Cookies are pieces of information stored directly on the computer you are using. Cookies allow us to recognize your computer and collect information such as Internet browser type, time spent on the Site, pages visited, and language preferences. We may use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize your experience when visiting the Site, or to gather statistical information about your use of the Site. We may use session cookies (which expire when you close your web browser) and persistent cookies to facilitate the use of the Site and Services, to improve our advertising, and to protect you and our business.

HOW DO WE USE COOKIES?

Our company uses cookies in various ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website

WHAT TYPES OF COOKIES DO WE USE?

There are several different types of cookies; however, our website uses:

- **Functionality:** Our company uses these cookies so that we recognize you on our website and remember your previously selected preferences. This may include the

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language you prefer and the location you are in. A combination of first-party and third-party cookies is used.

How to manage cookies

- You can set your browser not to accept cookies, and the previous website tells you how to remove cookies from your browser. However, in some cases, some of our website features may not function as a result.

AD SERVERS

We do not have any special association or relationship with any ad server companies.

YOUR RIGHTS

Upon request, we provide website visitors with access to all information (including proprietary information) that we maintain about them, including financial information (e.g., credit card account information).

Unique identifying information (e.g., customer number or password) transaction information (e.g., dates customers made purchases, amounts and types of purchases) communications the consumer/visitor directed to our website (e.g., emails, customer inquiries) contact information (e.g., name, address, phone number).

You can modify registration information you submitted by logging into your account and updating your profile information. Please note that copies of information that you have updated, modified, or deleted may remain visible on cached and archived pages of the Site for a period of time. Upon request, we offer visitors the ability to correct inaccuracies in such information. Consumers can correct this information by writing to us at the address shown above.

From time to time, we may use customer information for new, unanticipated uses not previously disclosed in our privacy notice. If our information practices change at any time in the future, we will notify you through our website. You will have the opportunity to opt-out of these new uses.

If you are concerned about how your information is used, you should consult our website regularly. If you believe that this website is not following its stated information policy, please contact us at the address shown above.

HOW DO WE STORE YOUR DATA?

Our company securely stores your data in two locations (Michigan and Florida) in the United States of America.

Please refer to the following paragraph regarding all security precautions taken to keep your information safe. You may also refer to our retention policy regarding your data anywhere in this document..

WEBSITE SECURITY

We have implemented reasonable technical, physical, administrative, and organizational security measures designed to protect your personal data from accidental loss and unauthorized access, use, alteration, and disclosure. We use encryption technology for the information we send and receive. Pages where this information is exchanged are hosted on a secure server.

Please note that despite our best efforts, no data security measure can guarantee 100%

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security. You should take steps to protect yourself from unauthorized access to your password, phone, and computer, among other things, by signing out after using a shared computer, choosing a strong password that no one else knows or can easily guess, and keeping your username and password private. We are not responsible for lost, stolen, or compromised passwords or any activity on your account via unauthorized password activity.

Remember that you are responsible for maintaining the confidentiality of this password. We ask that you not share your password with anyone.

We will take appropriate technical, physical, legal, and organizational measures that are consistent with applicable privacy and data security laws. If you have reason to believe that your interaction with us is no longer secure (for example, if you believe the security of any personal information you may have with us has been compromised), please notify us immediately.

PRIVACY POLICIES OF OTHER WEBSITES

We may provide links to websites as a service or for further information and/or legal requirements. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

CHANGES TO OUR PRIVACY POLICY

Our company regularly reviews its privacy policy and posts any updates on this web page. This privacy policy was last updated on December 27, 2023.

INFORMATION FOR USERS ACCESSING OUR SERVICES FROM THE EUROPEAN ECONOMIC AREA (EEA)

This notice is addressed to individuals located in the European Economic Area ("EEA"). Our processing of personal data of individuals located in the EEA is governed by the General Data Protection Regulation (the "GDPR"), which applies from May 25, 2018. The GDPR requires us to provide you with certain information about your personal data, which we refer to in this notice as your personal information. This supplements the information we have already disclosed in this document.

INFORMATION REGARDING TRANSFERS OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

ILSTECHNIK's main administrative offices are located in the U.S. and that is where we process personal information collected through our website. When you provide us with personal information, we request your consent to transfer that personal information to the U.S. The U.S. does not have an adequacy decision from the European Commission, which means the Commission has not determined that U.S. laws provide adequate protection for personal information. While U.S. laws do not provide legal protection equivalent to EU data protection laws, we protect your personal information by treating it in accordance with this GDPR Privacy Notice. We take appropriate measures to protect your privacy and implement reasonable security measures to protect your stored personal information. We use secure transmission methods to collect personal data through our website.

Privacy Policy and Data Protection Rights**PERSONAL INFORMATION RETENTION PERIOD**

The time we retain personal information varies depending on the type of information in question and the purpose for which it is used. We delete personal information within a reasonable period after we no longer need to use it for the purpose for which it was collected (or for any subsequent purpose that is compatible with the original purpose). This does not affect your right to request that we delete your personal data before the retention period ends. We may archive personal data (meaning store it in inactive files) for a certain period of time before its final deletion, as part of our normal business continuity procedures.

Without prejudice to the other provisions of this Section, we will retain documents (including electronic documents) containing personal data:

- To the extent required by law.
- I believe the documents may be relevant to any ongoing or future legal proceedings.
- I intend to establish, exercise, or defend our legal rights (including providing information to third parties for fraud prevention and credit risk reduction purposes).

RIGHTS TO ACCESS, RECTIFICATION, RESTRICTION OR ERASURE OF YOUR PERSONAL DATA AND TO OBJECT TO PROCESSING

You have the right to request access to your personal data, to have your personal data rectified, restricted, or erased, and to object to our processing of your personal data. You may also have the right to data portability, meaning you can request that we provide you (or a third party you designate) with a transferable copy of the personal information you have provided to us. Your rights may be subject to various limitations under GDPR. If you wish to exercise any of these rights, or if you have any questions about the processing of your personal data, please contact us in any of the ways listed in the "How to Contact Us" section of our general Privacy Notice.

DATA BREACHES AND OTHER DATA INCIDENTS

Upon becoming aware of an accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Customer Data, including Personal Data, transmitted, stored, or otherwise processed by ILSTECHNIK, Inc., or its Sub-processors ("Security Incident"), ILSTECHNIK, Inc., will notify Customer without undue delay and in accordance with the terms of the Agreement, but within no more than seventy-two (72) hours, and provide timely information that Customer may reasonably require to enable.

The Customer must comply with any data breach notification obligations under EU Data Protection Legislation. ILSTECHNIK, Inc. will make all reasonable efforts to identify the cause of such Security Incident and to take such steps as ILSTECHNIK, Inc. deems necessary and reasonable to remedy the cause of such Security Incident to the extent that remediation is within ILSTECHNIK, Inc.'s reasonable control. The obligations herein do not apply to incidents caused by the Customer or the Customer's Users.

DATA PROTECTION AGREEMENT**DEFINITIONS**

- a. **"Affiliate"** means any entity that directly or indirectly controls, is controlled by, or is under common control with such entity. For the purposes of this definition, "control" means direct or indirect ownership or control of more than 50% of the voting interests of

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the entity in question.

b. **"Authorized Affiliate"** means any of Customer's Affiliates that (a) is subject to the data protection laws and regulations of the European Union, the European Economic Area and/or its member states, Switzerland and/or the United Kingdom, and (b) is authorized to use the Services in accordance with the Agreement between Customer and ILSTECHNIK, Inc., but has not signed its own Order Form with ILSTECHNIK and is not a "Customer" as defined in the Agreement.

c. **"Controller"** refers to the entity that determines the purposes and means of the processing of personal data.

d. **"Customer Data"** means what is defined in the Agreement as "Customer Data" or "Your Data".

e. **"Data Protection Laws and Regulations"** refers to all laws and regulations, including the laws and regulations of the European Union, the European Economic Area and its member states, Switzerland and the United Kingdom, applicable to the processing of personal data under the Agreement.

f. **"Data Subject"** means the identified or identifiable natural person to whom the Personal Data relates.

g. **"GDPR"** means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

h. **"Personal Data"** refers to any information relating to (i) an identified or identifiable natural person and, (ii) an identified or identifiable legal entity (where such information is similarly protected as personal data or personally identifiable information under applicable Data Protection Laws and Regulations), where for each (i) or (ii), such data is Customer Data.

i. **"Processing"** refers to any operation or set of operations performed on Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

j. **"Processor"** means the entity that processes personal data on behalf of the Controller.

k. **"ILSTECHNIK, Inc."** refers to the ILSTECHNIK entity established in the Agreement that is a party to this DPA.

l. **"ILSTECHNIK, Inc., Group"** means ILSTECHNIK, Inc. and its Affiliates engaged in the Processing of Personal Data.

m. **"Customer" refers to the Customer established in the Agreement and who is a party to this DPA.**

n. **"Standard Contractual Clauses"** means the agreement entered into between the Customer and ILSTECHNIK, Inc., and attached hereto as Annex 2, in accordance with the European Commission Decision (C(2010)593) of February 5, 2010 on standard contractual clauses for the transfer of personal data to processors established in third countries which do not ensure an adequate level of data protection.

o. **"Sub-processor"** means any Processor engaged by ILSTECHNIK, Inc., or a member of

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the **ILSTECHNIK, Inc. Group**.

p. **"Supervisory Authority"** means an independent public authority established by an EU Member State in accordance with the GDPR.

PROCESSING OF PERSONAL DATA

a) **Roles of the parties.** The parties acknowledge and agree that, with respect to the Processing of Personal Data, Customer is the Controller, ILSTECHNIK, Inc. is the Processor, and that ILSTECHNIK, Inc., or members of the ILSTECHNIK, Inc. Group, will engage Sub-processors in accordance with the requirements set forth in Section 5 "Sub-processors" below.

b) **Processing of Personal Data by Customer.** Customer shall, when using the Services, process Personal Data in accordance with the requirements of Data Protection Laws and Regulations. For avoidance of doubt, Customer's instructions for the Processing of Personal Data must comply with Data Protection Laws and Regulations. Customer shall be solely responsible for the accuracy, quality, and legality of the Personal Data and the means by which Customer acquired the Personal Data and shall indemnify, defend, and hold harmless any claim, damage, or fine against ILSTECHNIK, Inc., arising from any failure to acquire or use Personal Data with legal consent or legitimate business purpose or in violation of any legal data protection requirement.

c) **Processing of Personal Data by ILSTECHNIK, Inc.** will treat Personal Data as confidential information and will only process Personal Data on behalf of and in accordance with Customer's documented instructions for the following purposes: (i) processing in accordance with the Agreement and applicable order forms; (ii) Processing initiated by Users in their use of the Services; and (iii) Processing to comply with other reasonable documented instructions provided by Customer (e.g., by email) where such instructions are consistent with the terms of the Agreement.

d) **Details of Processing.** The subject matter of ILSTECHNIK, Inc.'s Processing of Personal Data is the provision of the Services in accordance with the Agreement. The duration of Processing, the nature and purpose of Processing, the types of Personal Data, and the categories of Data Subjects Processed under this DPA are specified in more detail in Annex 1 (Details of Processing) of this DPA.

DATA SUBJECT RIGHTS

Data Subject Requests. ILSTECHNIK, Inc. shall, to the extent permitted by law, immediately notify Customer if ILSTECHNIK, Inc. receives a request from a Data Subject to exercise the right of access, right of rectification, restriction of Processing, erasure ("right to be forgotten"), data portability, objection to Processing, or their right not to be subject to automated individual decision-making ("Data Subject Request"). Taking into account the nature of the Processing, ILSTECHNIK, Inc. shall assist Customer through appropriate technical and organizational measures, insofar as possible, for the fulfillment of Customer's obligation to respond to a Data Subject Request under Data Protection Laws and Regulations. Furthermore, to the extent that Customer, in its use of the Services, does not have the ability to fulfill a Data Subject Request, ILSTECHNIK, Inc. shall, at Customer's request, make commercially reasonable efforts to assist Customer in responding to such Data Subject Request, to the extent that ILSTECHNIK, Inc. To the extent permitted by law, Customer shall be responsible for the costs arising from ILSTECHNIK, Inc.'s provision of such assistance.

Privacy Policy and Data Protection Rights**HOW TO CONTACT US**

If you have any questions about our company's privacy policy, the data we hold about you, or if you wish to exercise one of your privacy protection rights, please do not hesitate to contact us.

Email us at: Dcomercial@hascompanies.com

Call us: +1 (305)-328-3897

Or write to us at: 1571 Sawgrass Corporate Pkwy, Suite 110, SUNRISE, FL 33323-2862

INTERNATIONAL LOGISTICS SOLUTIONS (ILS)

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If you have any questions about our Data Processing Policy and are located in the European Economic Area ("EEA"), or if you wish to exercise one of your data protection rights, please do not hesitate to contact us.

ILSTECHNIK**c/o Data Privacy Officer**

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