

CALIFORNIA NOTICE

NAVIA USA, LLC

LAST UPDATED: DECEMBER 15, 2025

SCOPE OF SUPPLEMENTAL NOTICE

This additional California Notice (the "Notice") supplements the information contained in our Privacy Policy and applies solely to residents of the State of California ("consumers" or "you"). A California resident is a natural person (as opposed to a corporation or other business entity) who resides in California, even if the person is temporarily outside of the state.

This Notice provides additional information about how we collect, use, disclose, and otherwise process personal information of residents of the State of California, either online or offline, and describes rights that may be afforded to you within the scope of the California Consumer Privacy Act of 2018 ("CCPA"), as amended by the California Privacy Rights Act of 2020 ("CPRA"), where applicable.

Unless otherwise expressly stated, all terms in this Notice have the same meaning as defined in our [Privacy Policy](#) or as otherwise defined in the CCPA and CPRA.

COLLECTION, USE, AND DISCLOSURE OF PERSONAL INFORMATION

We may collect, transmit, and store "personal information", including "sensitive personal information", about you in connection with your use of the NAVIA Services, including the NAVIA Site.

When we use the term "personal information" or "PI" in this Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer or household. Personal information generally is a fact about an individual, which, if combined with one or more other facts about the individual, would enable others to determine the specific person to whom the facts apply. PI does not include publicly available information or lawfully obtained truthful information that is a matter of public concern.

"Sensitive personal information" or "SPI" is a subset of personal information that requires greater security protections and standards of care in handling. SPI is defined as information that if lost, compromised, or disclosed could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual.

"Process", "processed", or "processing" means any operation or set of operations that is performed on personal information, 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 of personal information.

Our collection, use, and disclosure of personal information about a California resident will vary depending upon the circumstances and nature of our interactions or relationship with such resident. Pursuant to the CCPA/CPRA, we may collect and disclose for a business purpose, and

have done so in the prior 12 months (as indicated with a YES or NO), the following categories of personal information (as defined by the CCPA/CPRA):

CATEGORY	EXAMPLES	COLLECTED
Identifiers:	Such as name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers	YES
Customer records (i.e., categories of personal information set forth in Cal. Civ. Code 1798.80(e)):	Such as name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit or debit card number, other financial information, medical information, or health insurance information	YES
Characteristics of protected classifications under California or federal law:	Such as race, religion, sexual orientation, gender identity, gender expression, or age	YES
Commercial information:	Such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	YES
Biometric information:	Such as hair color, eye color, fingerprints, height, retina scans, facial recognition, voice, and other biometric data	NO
Internet or other electronic network activity information:	Such as browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement	YES
Geolocation data:	Such as precise location information about a particular individual or device	YES
Audio, electronic, visual, thermal, olfactory, or similar information:	Such as CCTV footage, photographs, and audio recordings	YES

Professional or employment-related information:	Such as work history and prior employers	YES
Education information:	Such as information that is not “publicly available personally identifiable information” as defined in the California Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99)	YES
Inferences from personal information collected:	Inferences drawn from any of the information identified above to create a profile reflecting a consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes	NO
Sensitive personal information:	Such as PI that reveals social security, driver’s license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; citizenship or immigration status; the contents of mail, email, and text messages unless the business is the intended recipient of the communication; genetic data; neural data; the processing of biometric information for the purpose of uniquely identifying a consumer; or PI collected and analyzed concerning a consumer’s health, sex life, or sexual orientation	YES

Note: “Personal information” does not include publicly available information or lawfully obtained, truthful information that is a matter of public concern. As used herein, “publicly available” means information that is lawfully made available from federal, state, or local government records; or information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media; or information made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience. “Publicly available” does not mean biometric information collected by a business about a consumer without the consumer’s knowledge. “Personal information” does not include consumer information that is deidentified or aggregate consumer information. “Personal information” can exist in various formats, including, but not limited to, all of the following: (i) physical formats, including paper documents, printed images, vinyl records, or video tapes; (ii) digital formats, including text, image, audio, or video files; or (iii) abstract digital formats, including compressed or encrypted files, metadata, or artificial intelligence

(AI) systems that are capable of outputting personal information. Sensitive personal information that is publicly available is not considered “sensitive personal information” or “personal information”.

Note: NAVIA does not use automated decision-making technology (ADMT) for employment-related decisions.

SOURCES OF PERSONAL INFORMATION

The sources from which we collect personal information depend on, among other things, our relationship or interaction with a specific California resident. The categories of sources from whom we collect this personal information are:

- Directly from you, or other individuals acting on your behalf, through physical (e.g., paper application or in person), audible (e.g., phone), or electronic (e.g., website, social media, email) sources.
- Automatically through your access or use of the NAVIA Site, including through your interaction with the website, online platforms Navia Hub and Navia Connect, mobile app, and/or social media.
- While making an inquiry or purchasing the NAVIA Services or otherwise transacting business with us.
- Via service partners and providers, clients, contractors, suppliers, vendors, advertisers, recruitment agencies, employers, business partners, and other third parties.
- From our clients, who may provide us with shipping information (such as pickup and delivery addresses) and other documents that contain personal information about their customers for this purpose. If you are a customer of a business that uses the NAVIA Services, we may receive certain personal information about you in this context.
- Through social networking sites and services.
- Information provided by our affiliates and subsidiaries.
- Public record sources or widely available sources, including information from the media, and other records and information that are made available by federal, state, or local government entities.

TO WHOM WE DISCLOSE PERSONAL INFORMATION

The categories of third parties with whom we share personal information depend on, among other things, our relationship or interaction with a specific California resident. The categories of third parties to whom we disclose personal information for our business purposes described in this Notice are:

- Affiliates, related entities, and subsidiaries of NAVIA.

- Suppliers, contractors, and partners that we work with to deliver our integrated freight forwarding and third-party logistics services (including but not limited to carriers, transportation providers, warehousing providers, customs brokers, and others).
- Service partners and providers, contractors, suppliers, vendors, advertisers, and other third parties who provide us with technical and support services or who manage some of our business functions, such as website hosting, storage, data analysis, payment processing, order fulfillment, shipping, information technology and related infrastructure, customer service and communications, promotion management, email delivery, auditing, advertising and marketing, and marketing research activities.
- Other third parties who enable customers to conduct transactions online and via mobile devices.
- Our accountants, insurers, attorneys, auditors, and other professional advisers.
- Any third parties to whom you have directed or permitted us to disclose your personal information.
- Government agencies and authorities, as required by laws and regulations, including but not limited to local customs and border protection.
- In the unlikely event that we or our assets may be acquired or considered for acquisition by a third party, that third party and its advisors.

USE OF PERSONAL INFORMATION

The purposes for which we collect and use personal information depend on, among other things, our relationship or interaction with a specific California resident. In the past 12 months, we have used personal information relating to California residents to operate, manage, and maintain our business, to provide the NAVIA Services, and to accomplish our business purposes and objectives, including the following:

- To provide you with the NAVIA Services (including freight forwarding services, customs consultancy services, logistics services, and e-commerce services), and to otherwise fulfill your requests for products, goods, and services, and process and deliver your transactions and orders.
- To provide you with updates and information relating to your cargo, including dispatch and tracking information.
- To provide you with information in response to your inquiries, and to provide you with customer service.
- To send you push notifications and other electronic communications (including SMS) for our business purposes, including to provide updates on your cargo, where you have provided us with access to your geographical location via the NAVIA Site, including via the online platforms Navia Hub and Navia Connect, or any of our mobile applications.

- To perform various services, including maintaining or servicing accounts, providing customer support, processing or fulfilling orders and transactions, verifying customer information and identity, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services.
- To enable your access to and use of our products, goods, and services and the NAVIA Site features, as well as to allow you to participate in interactive features of the NAVIA Site when you choose to do so.
- To create and manage your account with NAVIA.
- To provide you with access to and use of the online platforms Navia Hub and Navia Connect.
- To send periodic emails regarding your order or other products, goods, and services.
- To personalize your experience and to allow us to deliver the type of content, advertising, and offerings in which you are most interested.
- To undertake activities to verify or maintain the quality or safety of a service controlled by us, and to improve, upgrade, or enhance the service controlled by the business.
- To administer promotions, customer satisfaction and market research surveys, or other NAVIA Site features.
- To provide, maintain, protect, develop, and improve the NAVIA Site, and to notify you about changes to the NAVIA Site.
- To email you information about the NAVIA Site, including the newsletter.
- To mail information about the NAVIA Site and marketing materials to you.
- To offer you additional information, opportunities, promotions, and functionality from us or on our behalf.
- To consider you for a job (whether as an employee or contractor) or other relationships with us.
- To assist us in taking data security precautions, detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- To detect, prevent, and address technical issues.
- To debug, identify, and repair errors that impair existing intended functionality.
- To undertake internal research for technological development and demonstration.

- To comply with applicable international, federal, state, provincial and local laws, directives, rules, regulations, and ordinances; civil, criminal or regulatory investigations; or other legal requirements, such as court orders.

NO SALE OR SHARING OF PERSONAL INFORMATION

In the past 12 months, we have not “sold” or “shared” personal information subject to the CCPA/CPRA, including personal information of minors under the age of 16. For purposes of this disclosure, “sold” means the disclosure of personal information to a third-party for monetary or other valuable consideration, and “shared” means the disclosure of personal information to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration. We do not sell or share your personal information and will not do so in the future without providing you with notice and an opportunity to opt out of such sale or sharing as required by law.

YOUR CALIFORNIA PRIVACY RIGHTS

As a California resident, you *may* be able to exercise the following rights in relation to the personal information about you that we have collected (subject to certain limitations at law):

- **The Right to Know.** You have the right to request any or all of the following information relating to the personal information we have collected about you or disclosed in the last 12 months, upon verification of your identity:
 - The specific pieces of personal information we have collected about you;
 - The categories of personal information we have collected about you;
 - The categories of sources of the personal information we have collected about you;
 - The categories of personal information that we have disclosed about you to third parties, and the categories of recipients to whom this information was disclosed;
 - The categories of personal information we have sold or shared about you, and the categories of third parties to whom this information was sold or shared; and
 - The business or commercial purposes for collecting or selling personal information about you.
- **The Right to Request Deletion.** You have the right to request the deletion of personal information that we have collected from you, subject to certain exceptions.
- **The Right to Request Correction.** You have the right to request the correction of inaccurate personal information that we maintain about you.
- **The Right to Opt Out of the Sale or Sharing of Personal Information.** You have the right to direct us not to sell or share personal information we have collected about you to third parties now or in the future. If you are under the age of 16, you have the right to opt in, or to have a parent or guardian opt in on your behalf, to such sales or sharing.
- **The Right to Limit Use and Disclosure of Sensitive Personal Information.** You have the right to request us to limit the use and disclosure of your sensitive personal information collected by us to that use which is necessary to perform the services reasonably expected by an average consumer who requests those services.

- **The Right to Equal Treatment; Non-Discrimination.** As a California resident, you have the right not to receive discriminatory treatment for exercising any of the rights described above. We will not discriminate against you for exercising any of your CCPA/CPRA rights and we will not deny you services, charge you a different price, or provide you with a lesser quality of services if you exercise any of your CCPA/CPRA rights. However, please note that if the exercise of the rights described above limits our ability to process personal information (such as in the case of a deletion request), we may no longer be able to provide you our products or services or engage with you in the same manner.

HOW TO EXERCISE YOUR CALIFORNIA PRIVACY RIGHTS

- **To Exercise Your Right to Know, Your Right to Request Deletion, or Your Right to Request Correction.** To exercise your rights to know, to request deletion, or to request correction, please submit a request by:
 - Emailing privacy@naviafreight.com with the subject line "California Rights Request" or
 - Calling us toll free at **1-833-209-2270**

We will need to verify your identity before processing your request. In order to verify your identity, we will generally either require the successful login to your account or the matching of sufficient information you provide us to the information we maintain about you in our systems. Although we try to limit the personal information collected in connection with a request to exercise the right to know, the right to request deletion, and the right to request correction to that personal information identified herein, certain requests may require us to obtain additional personal information from you. In certain circumstances, we may decline a request to exercise the right to know, the right to request deletion, and/or the right to request correction, particularly where we are unable to verify your identity.

- **To Exercise Your Right to Opt Out of the Sale or Sharing of Personal Information; Do Not Sell or Share My Info.** We do not currently and will not sell or share in the future any personal information without providing you with notice and an opportunity to opt out of such sale or sharing as required by law.
- **The Right to Limit Use and Disclosure of Sensitive Personal Information.** We collect SPI for permitted purposes only pursuant to the CCPA/CPRA, including to provide goods and services reasonably expected by a requesting consumer. Such processing of SPI is not done to infer characteristics about a consumer. We will notify you as required by law before using or disclosing any SPI for any reasons other than those necessary to provide goods or services, and provide you with an opportunity to limit use and disclosure of SPI.
- **Authorized Agent.** In certain circumstances, you are permitted to use an authorized agent registered with the California Secretary of State to submit requests on your behalf where (i) you provide sufficient evidence to show that the requestor is an authorized agent with written permission to act on your behalf and (ii) you successfully verify your own identity with us.

Non-affiliated third parties are independent from us, and if you wish to receive information about your disclosure choices or stop communications from such third parties, you will need to contact those non-affiliated third parties directly.

NOTICE OF FINANCIAL INCENTIVES

We do not offer incentives in exchange for the retention, sale, or sharing of personal information. We do not hold contests, sweepstakes, or provide special offers. In the event we elect to do so in the future, for those users who have elected to participate, such users shall let us contact them by email, text messaging, direct messaging, and/or through social media. Participation is voluntary, and users always have the option to not supply information and/or to opt out.

"SHINE THE LIGHT" LAW

California residents that have an established business relationship with us have rights to know how their information is disclosed to third parties for their direct marketing purposes under California's "Shine the Light" law (Civ. Code § 1798.83). Under the "Shine the Light" law, California residents who provide certain personal information in connection with obtaining products or services for personal, family, or household use are entitled to request and obtain from us once a calendar year information about the customer information we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of customer information and the names and addresses of those businesses with which we shared customer information for the immediately prior calendar year.

Such requests must be submitted to us by contacting us in accordance with the "Contact Us" section below, and specifying that you want a copy of your "Shine the Light" California Privacy Rights Notice. We will provide the requested information to you at your email address in response. Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing will be included in our response.

CALIFORNIA'S "DO NOT TRACK" NOTICE: THIRD PARTY BEHAVIORAL TRACKING.

"Do Not Track" ("DNT") is a preference you can set in your web browser to let the sites you visit know that you do not want them collecting information about you. We are strongly committed to not sharing personal information with third parties; under this Privacy Policy, we may share your information only under particular situations, as described herein. Because we protect all users in this manner, we do not change our behavior in response to a web browser's "Do Not Track" signal. For further details regarding DNT, visit <https://allaboutdnt.com/>. Further, we do not allow third party behavioral tracking.

We may receive information about you from publicly and commercially available third-party sources, as permitted by law, which we may combine with other information we receive from or about you, including from companies that collect consumer information such as demographic and interest data. In addition, if you access third-party services, such as Facebook, Instagram, Google, YouTube, LinkedIn, or X (Twitter), or an email service provider, from the NAVIA Site to log into or otherwise access the NAVIA Site, or to share information about your experience, we may collect information from these third-party services.

GLOBAL PRIVACY CONTROL

Global privacy control ("GPC") is also known as a universal opt-out preference signal, which allows users to automatically communicate their privacy preferences to every website they visit. We do not currently sell or share personal data, and we do not use targeted advertising; therefore, any opt out of the sale or sharing of personal data or opt out of targeted advertising within the GPC is not applicable. If applicable in the future, we will honor the GPC universal opt-out

mechanism. The GPC has been recognized by the California Attorney General. To learn more about the GPC, you can visit its website here: <https://globalprivacycontrol.org/>.

UPDATES

We may update this Notice from time to time. When we make changes to this Notice, we will change the "Last Updated" date at the beginning of this Notice. If we make material changes to this Notice, we will notify you by email to your registered email address, by prominent posting on our online services, or through other relevant communication channels. All changes shall be effective from the date of publication unless otherwise provided in the notification.

CONTACT US

If you have any questions, comments, or concerns regarding this Notice or our privacy practices, please send an email to privacy@naviafreight.com, call us toll free at **1-833-209-2270**, or contact us in writing at the following address: **200 N. Martingale Road, Suite 400 Schaumburg, Illinois 60173, U.S.A.**