

Biometric Privacy Policy
for
Allied Van Lines, Inc. and North American Van Lines, Inc.

This Biometric Data and Information Privacy Policy (“**Biometric Privacy Policy**”) defines the policy and procedures for collection, storage, usage, disclosure, and protection of biometric data and information by Allied Van Lines, Inc. and North American Van Lines, Inc. (collectively, “**AVL/NAVL**”).

Purpose

AVL/NAVL, their agents and their respective service providers collect, store, and use drivers’ facial images, including face geometry from inward-facing cameras, solely for the purpose of determining certain driving behaviors (herein, “**Purpose**”).

Biometric Data Defined

“**Biometric Data**” means the personal information collected, stored, retained, accessed, or otherwise processed by AVL/NAVL, their agents and their respective service providers’ communications systems, equipment operational usage and tracking applications. Biometric Data may include Biometric Identifiers and Biometric Information.

“**Biometric Identifier**” means a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. Biometric identifiers do not include writing samples, written signatures, photographs, human biological samples used for valid scientific testing or screening, demographic data, tattoo descriptions, or physical descriptions such as height, weight, hair color, or eye color. Biometric identifiers do not include information captured from a patient in a health care setting or information collected, used, or stored for health care treatment, payment, or operations under the federal Health Insurance Portability and Accountability Act of 1996.

“**Biometric Information**” means any information, regardless of how it is captured, covered, stored, or shared based on an individual’s Biometric Identifier used to identify an individual. Biometric Information does not include information derived from items or procedures excluded under the definition of Biometric Identifier.

Policy and Procedures

It is AVL/NAVL’s policy to comply with all applicable laws protecting biometric data and information. To the extent that AVL/NAVL, their agents, and/or their vendors collect, store, or use biometric data relating to a driver providing services to AVL/NAVL, AVL/NAVL will abide by the following procedures:

1. AVL/NAVL will inform or will require its agents to inform the driver in writing that AVL/NAVL is collecting, capturing, or otherwise obtaining the driver’s Biometric Data, Biometric Identifiers, and Biometric Information and that AVL/NAVL may be providing such Biometric Data, Biometric Identifiers, and/or Biometric Information to its service providers.
2. AVL/NAVL will obtain the driver’s written consent before collecting a driver’s Biometric Data, Biometric Identifiers or Biometric Information.

3. AVL/NAVL will not disclose or disseminate driver Biometric Data, Biometric Identifiers or Biometric Information unless the driver consents, or the disclosure or dissemination is required or otherwise permitted by applicable law.
4. AVL/NAVL will not sell, lease, trade, or otherwise profit from driver's Biometric Data, Biometric Identifiers and Biometric Information; provided, however, that AVL/NAVL's service providers may be paid for the products or services used by AVL/NAVL that utilize such Biometric Data, Biometric Identifiers and Biometric Information.
5. AVL/NAVL will not disclose and will require their agents not to disclose driver Biometric Data, Biometric Identifiers or Biometric Information to anyone other than AVL/NAVL service providers without or unless: AVL/NAVL or their agents obtain written driver consent for such disclosure; the disclosure is requested and authorized by the driver; disclosure is required by relevant state or federal law, or municipal ordinance; or disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction or tribunal.
6. AVL/NAVL will update the Biometric Privacy Policy and obtain drivers' consents if AVL/NAVL collects Biometric Data or Biometric Information for any purpose not described in this Biometric Privacy Policy.

Retention Schedule and Data Storage

AVL/NAVL shall retain driver Biometric Data, Biometric Identifier, or Biometric Information while the information is needed to fulfill the Purpose for which it is collected; and AVL/NAVL shall request to its service providers that such Biometric Data, Biometric Identifier, or Biometric Information be permanently destroyed after such information is no longer needed to fulfill the Purpose. Unless AVL/NAVL is required to retain Biometric Data and Biometric Information longer under applicable law, it is AVL/NAVL's policy to securely destroy Biometric Data and Biometric Information within a reasonable time after the purpose for which the Biometric Data and Biometric Information was collected ends. Following are examples of when AVL/NAVL permanently destroys such data:

- No later than 1 year after the initial purpose for collecting or obtaining such Biometric Data and/or Biometric Information has been satisfied, such as the termination of a driver's provision of service for or on behalf of AVL/NAVL for which Biometric Data and Biometric Information was collected; or
- Within 3 years of the driver's last interaction with AVL/NAVL.

AVL/NAVL will store, transmit, and protect Biometric Data, Biometric Identifiers and Biometric Information using a reasonable standard of care applicable to the organizations in its industry and in a manner that is the same as or more protective than the way AVL/NAVL stores, transmits, and protects other confidential information.