

# FLEETCOR U.S. Privacy Policy

FleetCor takes the privacy of your personal information seriously. In the course of operating our business and interacting with you, we collect, use, and share personal information. This Privacy Policy provides you with information about how we collect, use, and share personal information, and describes choices and rights available to you regarding your personal information. If you have any questions, please contact us via the channels listed below.

## ABOUT THIS PRIVACY POLICY

This Privacy Policy applies to FleetCor Technologies, Inc. and its U.S. subsidiaries, divisions, affiliates, and operations, including, but not limited to, Cambridge Mercantile Corp. (U.S.A), Comdata Inc., Comdata Network, Inc. of California, Comdata TN, Inc., and Nvoice Pay, Inc. (collectively, “FleetCor,” “we,” “our,” or “us”). In this Privacy Policy, the words “you” and “your” refer to you, the user of our Services, as the party agreeing to this Privacy Policy.

This Privacy Policy describes our privacy practices for information that we collect from your interactions with us, including, but not limited to:

- Use of this website and any other websites owned or controlled by us which reference or link to this policy (the “Website” or “Websites”);
- Use of the software applications made available by us for use on or through computers and mobile devices (the “Apps”);
- Use or consideration of our products and services, including our electronic payment services, fuel payment services, lodging services, and gift card services (the “Services”);
- Interacting with us, including contacting our customer service department, connecting with us on social media, posting to our social media pages, and tagging us in your social media posts (collectively, the “Communications”); and

- Responding to or viewing our advertisements or participating in our surveys, promotions, giveaways, sweepstakes, and contests (the “Participation Opportunities”).

The Websites, the Apps, the Services, the Communications, and the Participation Opportunities are collectively referred to as the “Company Activities and Interactions.”

This Privacy Policy also applies to personal information that we receive from business partners and other third parties. You can find more information about our collection of personal information below.

Additional privacy disclosures or policies may apply in connection with your use of a specific product or relationship you may have with one of our U.S. lines of business. Please read this Privacy Policy and any additional privacy disclosures or policies to understand our views and practices.

This Privacy Policy does not apply to third-party websites accessible through our Websites.

## **1. ACCEPTANCE**

Please read the following carefully to understand our views and practices. By using, visiting, or participating in the Company Activities and Interactions, you are accepting and consenting to the practices described in this Privacy Policy.

## **2. PERSONAL INFORMATION WE COLLECT**

"Personal Information" means any data that identifies you as an individual or relates to an identifiable individual. We obtain various categories of Personal Information relating to you from various sources described below.

### **2.1 CATEGORIES OF PERSONAL INFORMATION WE COLLECT**

The categories of Personal Information that we may collect include:

- Identifiers. We may collect identifiers, such as first name, middle name, last name, maiden name, alias, email address, phone number, username, photographs, physical address, geolocation information, IP address, date and place of birth, digital signature, passenger name record (“PNR”), social security number, driver’s license or state/governmental identification number, and tax identification number (“TIN”).
- Demographic Information. We may collect demographic information, such as age, gender, and marital status.
- Internet Activity. We may collect internet activity information, such as IP address, browser characteristics, device IDs and characteristics, operating system version, and referring URLs.
- Commercial Information. We may collect commercial information, such as Apps or Services purchased and/or used.
- Social Media Information. We may collect information from your social media account consistent with your settings within the social media service, such as location, check-ins, activities, interests, photos, status updates, and friend list.
- Payment Information. We may collect payment information, such as credit or debit card information, bank account information, and billing information.
- Location Information. We may collect location information, such as location based on IP address or geolocation information.
- Employment Information. We may collect employment information, such as employment history, current and former employer names and addresses, profession or title/role, employer/employee identification information, expense information, tax and withholding information, and emergency contact information.
- Audio Recordings. We may collect audio recordings, such as customer care calls.
- Chat Content. We may collect chat or text content and history, such as customer care conversations.
- Inferences. We may collect inferences regarding your marketing and communications preferences, interests, and other characteristics.

## 2.2 WHERE WE COLLECT PERSONAL INFORMATION FROM

### Personal Information Obtained from You

We collect Personal Information from you directly in a variety of ways. Some examples are when you:

- **Conduct Business with Us.** We collect Personal Information from you at various places and through various mechanisms when you use, visit, or participate in the Company Activities and Interactions. This may include, for example, when you use, purchase, obtain or consider our Services or register on our customer portals. For our Websites, Apps, and Services that offer electronic payment services and gift cards, the information you give us may include another individual's Personal Information. By submitting personal information with respect to anyone else, you warrant that you have the full authority to do so and are not violating any applicable law.
- **Pay for Services.** We collect Personal Information from you in order to fulfill your order and your request for Services.
- **Inquire about Our Services or Request Information or Materials from Us.** We collect Personal Information from you in order to respond to your request for a quote or inquiry about our Services.
- **Contact Customer Care Centers.** We collect Personal Information from you when you contact us, including when you communicate with us by email, fax, or via online chat services or contact customer service. These verbal communications may be recorded for purposes of quality assurance and training.
- **Enter Promotions, Giveaways, Sweepstakes or Contests.** We collect Personal Information from you when you enter our promotions, giveaways, sweepstakes, and contests (which may be done in conjunction with Website registration), or if you participate in our promotions or special programs.

- **Social Media.** We collect Personal Information from you when you choose to participate in our social media activities or offerings. We may also allow you to enter into contests to provide photos which you may share with your connections on social media for votes, shared offers or other promotions.
- **Application for Employment.** We collect Personal Information from you when you choose to apply online for employment with us in order to assess your suitability for employment.

### **Personal Information Obtained from Third Parties**

We may collect your Personal Information from third parties. Some examples are when we collect information from:

- **Affiliates and Business Partners.** We may obtain your Personal Information from our affiliates and business partners in order to offer and provide our Services and to support our core business functions.
- **Credit Bureau and Agencies.** We may obtain third-party information (consumer and/or commercial credit reports) from credit bureaus and agencies which is reviewed to make a credit decision, determine risk and fraud profiles, and provide underwriting for accounts.
- **Customers.** For our Websites, Apps, and Services that offer gift cards, we may obtain your Personal Information from customers who purchase gift cards for you from merchants with whom we do business. This is for the purpose of delivering the gift card to you.
- **Marketing Partners.** We may obtain your Personal Information from our marketing partners including third parties from whom we purchase Personal Data.
- **Social Sign-On/Account Linking.** Our Websites may include functionality that allows integration with third-party sites, such as Twitter, Facebook, or other social networks. Some of those third-party services may provide us with your information to enhance and personalize your use of our Websites. If you submit your credentials (e.g., username and password) for a third-party website

or service during your registration on our Websites or in connection with updating your user profile, we may receive your information from such third-party website or service.

### **Personal Information Obtained Passively**

When you access our Websites, we and our service providers may collect Personal Information related to you, as well as processes and programs that are running on your device, through automated means, such as cookies, web beacons, and web server logs. A cookie is a small data file that a website transfers to your computer's hard drive. Web beacons (sometimes called transparent GIFs, clear GIFs, or web bugs) are small strings of code that provide a way for us to deliver a small graphic image (usually invisible) on a web page or in an email. Web beacons can recognize certain types of information on your computer such as cookies, the time and date a web page is viewed, and a description of the web page where the web beacon is placed. A web server log is a simple text file that records activity on the server, such as when and how visitors are accessing a website.

We may use cookies, web beacons, and web server logs to improve your experience on our Websites, including to troubleshoot and perform analytics on the Services, provide you with content customized to your interests, and understand whether users read email messages and click on links contained within those messages so that our Websites can deliver relevant content. We may also use web beacons, web server logs, and similar standard technologies to track your use of our Websites or to track your response to email messages that we send you in connection with our Websites.

By using our Websites, Apps, and Services, you consent to the placement of cookies, web beacons, and similar technologies in your browser and on emails in accordance with this Privacy Policy. To learn more about our use of cookies and how to set your preferences, please see our "Cookies" section below.

## **3. HOW WE USE YOUR PERSONAL INFORMATION**

We may use Personal Information provided to us as follows:

- To offer and provide our Services and to support our core business functions.
- To service or fulfill orders, including to communicate with you about our Services, send an order confirmation, register and service your account, and respond to customer service requests related to the Services we provide.
- To personalize your experience by displaying content based upon your interests.
- To maintain our customer relationship and provide you with information about or changes to our Websites, our Terms of Use, and/or this Privacy Policy.
- For internal business processes, authentication, loss and fraud prevention, public safety, and legal functions.
- For direct marketing purposes, including to invite you to participate in promotions, giveaways, sweepstakes, and contests and to send you information about our existing, new, or updated Services or news and information that you have otherwise requested through our newsletter subscription.
- To invite you to participate in user surveys or to ask for your feedback on our Websites, Apps, or Services.
- To conduct research, analysis, and advertising.
- For internal statistical, product development, marketing, or operational purposes, such as to measure and understand demographic, user, user interest, purchasing, and other trends among our users.
- To protect the security and integrity of our Company Activities and Interactions.
- To investigate, prevent, defend against, or take other action regarding violations of our Privacy Policy or Terms of Use, illegal activities, suspected fraud, or situations involving potential threats to the legal rights of us or others.
- To comply with applicable laws and regulations.

In some instances, we may combine Personal Information and other information we collect with offline information, including information from third parties. We may also transfer or disclose your information within our corporate family of companies for these purposes.

We will not use your Personal Information for any other purposes unless we notify you, or for which you have specifically consented to at the time of collection, or as otherwise described in this Privacy Policy, or as permitted or required by law, rule, regulation, subpoena, or other legal process.

## 4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We disclose your Personal Information to third parties when we have your prior consent and under the following limited circumstances:

- **Affiliates and Business Partners.** We may disclose your Personal Information to our affiliates and business partners that help with our Company Activities and Interactions for the purpose of offering and providing our Websites, Apps, and Services and to support our core business functions.
- **Service Providers.** We may disclose your Personal Information to our service providers that help with our Company Activities and Interactions for the purpose of offering and providing our Websites, Apps, and Services and to support our core business functions. In helping with our Company Activities and Interactions, our service providers may also process your Personal Information on our behalf. Examples of activities that our service providers help our company with include, but are not limited to, assisting with payments and orders, maintaining databases, assisting with billing, providing credit, complying with governmental or quasi-governmental reporting, assisting with collection services, providing customer service, or communicating with you about surveys, promotions, giveaways, sweepstakes, or contests. We may also share your

Personal Information with service providers to provide general functions on our behalf relating to the Services.

- Our service providers are obligated to protect your Personal Information and may not otherwise use or share your Personal Information, except for defined business purposes and as may be required by law.
- Your Personal Information may be stored and processed by our service providers in the United States or other locations where the service providers or we maintain facilities or conduct our operations, which includes cloud storage. We require our service providers to keep your information secure and also require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy. In addition, our service providers are prohibited from using or disclosing Personal Information for any purpose other than providing the services on our behalf.
- Merchants. For our Websites, Apps, and Services that offer gift cards, we may provide your Personal Information to merchants with whom we do business for the purpose of delivering gift cards to you or other people or entities. Our Services that offer gift cards may be embedded on the websites, mobile apps, and social media sites of the merchants with whom we do business.
- When you use our Services on the merchant's websites, mobile apps, or social media sites you may also be providing information to our merchants, and the merchant's privacy policies will apply to their collection, use, and disclosure of such information.
- From time to time, we may offer you the opportunity to participate in promotions, giveaways, sweepstakes, and contests. You may decline to participate in any or all of the promotions, giveaways, sweepstakes, and contests. Any information submitted in connection with such activities will be treated in accordance with this Privacy Policy, except as specifically set forth in the rules for the applicable promotion, giveaway, sweepstakes, or contest. We may use the information you provide when registering for a promotion, giveaway, sweepstakes, or contest to manage your entry, fulfill prizes (which may include disclosure to third-party entities that assist

with such fulfillment), and for other marketing and promotional purposes related to the promotion, giveaway, sweepstakes, or contest, as disclosed in the rules applicable to the particular event.

- From time to time, we may also ask you to participate in surveys designed to help improve our Websites. Any Personal Information provided in connection with any survey will be used only in relation to that survey and as set forth in this Privacy Policy.
- If we engage in a joint promotion with an affiliate or business partner, we may share your contact information with our affiliate or business partner, to be used solely in relation to the promotion. We will require such affiliate or business partner to keep your information secure and to only use your information based on our instructions and in compliance with this Privacy Policy.
- To a potential or actual acquirer, successor, or assignee as part of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets or stock (including in bankruptcy or similar proceedings).
- If required to do so by law or in the good faith belief that such action is appropriate: (i) under applicable law, including laws outside your country of residence; (ii) to comply with legal process; (iii) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (iv) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (v) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (vi) to allow us to pursue available remedies or limit the damages that we may sustain.
- We may use and disclose aggregate and/or de-identified information that does not identify or otherwise relate to an individual, for any purpose, including but not limited to market research, to project planning, to track the number of daily visitors to a particular web page, to track the size of an order placed on a certain date, and to troubleshoot problems, unless we are prohibited from doing so under applicable law.

## 5. LINKS TO OTHER SITES

Our Websites may contain third-party links, include third-party integrations, or offer a co-branded or third-party-branded service (collectively, “Other Links and Sites”). Through these Other Links and Sites, you may be providing information (including Personal Information and other information) directly to the third party (which may include certain service providers), us, or both. Because these Other Links and Sites may not be hosted or controlled by us, however, we are not responsible for the privacy practices of those Other Links and Sites or the content provided thereon.

This Privacy Policy does not apply to the information practices of those Other Links and Sites. We encourage you to review the privacy policies of each of those Other Links and Sites carefully. We are not responsible for third-party websites.

## 6. ANALYTICS SERVICES

The Websites may use analytics services provided by third parties, such as Google Analytics, Adobe Analytics, and Moz, among others (collectively, “Data Analytics Providers”). These Data Analytics Providers use collection technologies to collect and store information about the use of our Websites and the use of other websites, apps, and online resources.

You can read Google’s privacy policy, which applies to Google Analytics, at <http://www.google.com/intl/en/policies/privacy/>. You also can opt out from being tracked by Google Analytics in the future by downloading and installing Google Analytics Opt-out Browser Add-on for your current browser <https://tools.google.com/dlpage/gaoptout>. You can learn more about Adobe and opt out by visiting <http://www.adobe.com/privacy/opt-out.html>. You can read Moz’s privacy policy, which applies to Moz analytics, at <http://moz.com/privacy-policy>.

## 7. CROSS DEVICE TRACKING

If you use different devices, such as your home computer, laptop, mobile device, and/or other smart device, to access our Websites, Apps, and Services, we may use cross device tracking tools provided by

third parties, such as Adobe Marketing Cloud Device Co-op. The Adobe Marketing Cloud Device Co-op allows us to better understand how you use our Websites, Apps, and Services across the various smart devices you use and to deliver tailored promotions. You can visit <https://cross-device-privacy.adobe.com> to learn more about how Adobe does this and to manage your choices relating to linking of devices.

## 8. THIRD-PARTY ADVERTISERS

We may use third-party advertising companies to serve advertisements regarding goods and services that may interest you when you access and use our Websites or Apps, other websites or apps, or other online services. To serve such advertisements, these companies place or recognize a unique cookie on your browser, including through use of pixel tags. If you would like more information about this practice, and to learn about your choices in connection with it, please visit [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp) and <http://www.aboutads.info/>. To opt out of the practice, you may download the AppChoices app at [www.aboutads.info/appchoices](http://www.aboutads.info/appchoices).

## 9. COOKIES

We use cookies to collect information about your activity, browser, and device when you visit our Websites or websites where our ads appear. Cookies allow us to collect information such as browser type, time spent on the Websites, pages visited, referring URL, language preferences, and other aggregated traffic data. Below is a summary of the types of cookies we use.

- **Essential Cookies:** These are cookies without which you would not be able to use our Websites. For example, Essential Cookies adjust the Website data transmitted to match your internet connection, get you to the secure versions of the Website, and help provide services you specifically request. If you set your browser to block these cookies, some parts of the Website will not work.

- **Analytic Cookies:** These cookies count visits and traffic sources to measure and improve Website performance. We may use persistent cookies, which will remain on your computer even after you close your browser, to understand general Website usage and volume statistical information (which does not include Personal Information) and improve the content and offerings on our Websites. We may also use persistent cookies to store user preferences.
- **Functional cookies:** These cookies allow the Website to remember choices you make and provide enhanced functionality and more personalized features. These technologies are used so that we can provide a continuous and more personalized shopping experience for you (e.g., to recognize you by name when you return to a Website).
- **Advertising Cookies:** These cookies help us manage and display our advertisements based on your activity on our Websites and other websites; this is known as interest-based advertising. We may use targeting cookies to gather demographic information about our user base as a whole. We may allow third-party ad servers (i.e., third parties that provide technology to place ads on websites and track ad performance) to use cookies, web beacons, and other technologies to automatically collect information about your visit to our Websites or to place our ads on third-party websites and to analyze the effectiveness of those ads.

This Privacy Policy covers the use of cookies and other tracking devices by us. This Privacy Policy does not cover the use of cookies or other tracking technologies by any of our advertising partners. We encourage you to review the privacy policies or statements of these third-party advertising companies carefully. If you would like to learn more about the third-party advertisers that may be aware of the fact that you visit our Websites, and to understand your choices about having such advertisers' cookies turned off, please visit [www.networkadvertising.org](http://www.networkadvertising.org).

If you want to remove or block cookies on your device, you can update your browser settings (your browser manufacturer has information on changing the default setting for your specific browser). You can find simple instructions on how to manage cookies on the different types of web browsers at

www.allaboutcookies.org. You can also learn more about interest-based advertising and how to opt out of our vendors' and other advertisers' use of cookies and similar technologies to collect information to tailor content or advertising to you by

visiting [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp) and <http://www.aboutads.info/>.

Under certain state laws, collection of data through third-party cookies for targeted advertising and similar purposes may be considered a "sale." To opt-out of automated sales of Personal Information, please click [Do Not Sell My Personal Information](#)

## 10. SECURITY

We store your Personal Information and other information using reasonable physical, technical, and administrative safeguards. While we use industry standard means to protect our Websites, Apps, Services, and your information, no transmission of data over the internet is guaranteed to be completely secure. The measures we use are appropriate for the type of information we collect. However, it may be possible for third parties not under the control of us to intercept or access transmissions or private communications unlawfully. We cannot promise that your use of our Websites or Apps will be completely safe, nor can we ensure or warrant the security of any information you transmit to us over the internet. We encourage you to use caution when using the internet.

## 11. PRIVACY RIGHTS OF CALIFORNIA RESIDENTS

Under the California Consumer Privacy Act ("CCPA"), consumers have the right to request that a business not sell their personal information. We do not share your information with third parties in exchange for money. We do share your Personal Information with third parties to enhance your experiences with us, to improve our ability to serve you, and to keep you aware of our products, services, and offers. As described above in our "Cookies" section, California law may treat some such disclosures

as a “sale,” and consumers have a right under the CCPA to direct us not to sell their personal information. If you wish to opt out of such a sale of your personal information, please click [Do Not Sell My Personal Information](#)

In addition, the CCPA provides California residents with the following privacy rights:

- **Right to Delete:** Consumers have a right to request the deletion of personal information that we have collected from them, though we may be permitted to retain personal information for certain purposes.
- **Right to Know:** Consumers have a right to request information about the personal information that we collect, use, disclose, and sell.
- **Non-Discrimination:** We may not discriminate against you for exercising your rights under the CCPA.

If you are a California resident, or an authorized agent acting on behalf of a California resident, and would like to exercise one of these rights, please visit our website [here](#) or call us at +1 (888) 914-9661 (PIN 261782). When submitting such a request, please indicate the type of request you are making and provide the consumer’s first name, last name, email address, county, state, and the product or service the consumer has used. Once you submit a request, we will use that information to contact the consumer and attempt to verify the consumer’s identity by requesting a declaration and comparing the information provided to the information collected and/or maintained by us.

Please note there may be circumstances where we will not honor your request, as permitted under the CCPA. For example, if you request deletion, we may need to retain certain personal information to comply with our legal obligations.

To contact us with questions about our compliance with the CCPA, email us at [privacy@fleetcor.com](mailto:privacy@fleetcor.com).

Please note that consumers will not receive discriminatory treatment for the exercise of privacy rights conferred by the CCPA.

## 12. OUR WEBSITES AND CHILDREN

We do not knowingly collect or sell information regarding anyone under the age of 13. If you are a parent or guardian and believe we may have inadvertently collected personal information from your child, please notify us immediately by sending an email to [privacy@fleetcor.com](mailto:privacy@fleetcor.com).

## 13. MARKETING COMMUNICATIONS

If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt out by contacting us by email at [privacy@fleetcor.com](mailto:privacy@fleetcor.com) or by following the instructions in any such email you receive from us. We will try to comply with your request as soon as reasonably practicable. If you opt out of receiving marketing emails from us, we may still send you important administrative messages, from which you cannot opt out.

California Civil Code § 1798.83 further permits California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. If you are a California resident, you may ask us to refrain from sharing your personal information with certain of our affiliates and other third parties for their direct marketing purposes. Please tell us your preference by contacting us at [privacy@fleetcor.com](mailto:privacy@fleetcor.com).

## 14. CUSTOMER TESTIMONIALS

From time to time, we post customer testimonials on our Websites which may contain Personal Information, such as the customer's name. We do obtain the customer's consent prior to posting the testimonial. If you wish to update or delete your testimonial, you can contact us by sending an email to [privacy@fleetcor.com](mailto:privacy@fleetcor.com).

## 15. UPDATING YOUR PERSONAL INFORMATION

In certain circumstances, you may be able to review and request changes to your Personal Information on the Website or by send an email to [privacy@fleetcor.com](mailto:privacy@fleetcor.com).

## 16. CUSTOMER REQUESTS

Fleetcor will coordinate with its U.S. subsidiaries, divisions, affiliates, and operations to respond to any requests, questions, or concerns that you submit to us.

From time to time, Fleetcor may also request the assistance from its international subsidiaries, divisions, affiliates, and operations in responding to certain requests. For example, certain requests that you send related to Stored Value Solutions, a division of Comdata Inc. (“SVS”), may be fulfilled by Buyatab Online Inc., a Canadian company owned by Fleetcor. This assistance will not change the Privacy Policy that governs. As stated above in the “About This Privacy Policy” section, this Privacy Policy applies to FleetCor Technologies, Inc. and its U.S. subsidiaries, divisions, affiliates, and operations, which includes Comdata Inc. and SVS.

## 17. INTERNATIONAL VISITORS

Our Websites, Apps, and Services are hosted in the United States, which means Personal Information we collect will be processed by us in the United States where data protection and privacy regulations may be different or less stringent than other parts of the world, such as the European Union. If you use or visit our Websites, Apps, and Services, you consent to the collection and/or processing in the United States of Personal Information we collect from you.

## 18. INDIVIDUALS WITH DISABILITIES

If you have a disability and need access to our privacy policy in a different format, please contact us at [privacy@fleetcor.com](mailto:privacy@fleetcor.com).

## 19. CHANGES TO THIS PRIVACY POLICY

The Privacy Policy may be revised from time to time. The “Last Updated” legend at the bottom of this page indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on our Website. Your use of the Services following these changes means that you accept the revised Privacy Policy.

## **20. CONTACT US**

If you have any questions or concerns about this Privacy Policy or our privacy practices, please contact us at [privacy@fleetcor.com](mailto:privacy@fleetcor.com).

**Last Updated: October 20, 2020**