



Beacon Intermodal Leasing, LLC, and its subsidiaries and affiliates, (collectively, “Beacon” or the “Company”) recognizes its legal and social responsibility to protect the privacy and security of all individuals and sets out this privacy policy (this “Policy”) to guarantee its commitment to protecting an individual’s personal data in accordance with applicable laws, regulations, formal guidance, administrative policies and other applicable laws pertaining to information privacy. Beacon collects and processes the personal data of natural persons who are directors, officers, employees, agents, or authorized signatories of Beacon’s customers, suppliers, service providers, vendors, sub-suppliers, and other commercial partners (“Individuals”) for the purpose of and in connection with the Company’s dealings with those commercial entities. The Company management and employees abide by this Policy and ensure the protection of personal information.

This Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed. Please read this Policy carefully. By using our website, you agree to the terms of this Policy and consent to the practices outlined in this Policy. If you have any questions about this policy, please contact legal@beaconintermodal.com.

1 Processing Personal Data

1.1 Types of Personal Data Collected

“Personal Data” means any data relating to an identified or identifiable natural person, including, without limitation, Individuals’ name, company name, postal and email addresses, business contact information, telephone numbers, business bank account, IP address, web browser type, activity on the website and other data that enables the Individual to be identified.

1.2 Purpose of Use of Personal Data

- i. Use is for a legitimate purpose of Beacon, including:
 - a. Managing its contracts and relationships with its customers, suppliers, service providers, vendors, sub-suppliers, and other commercial partners;
 - b. Day-to-day operational and legitimate business purposes; limited to the need to fulfill such purpose;
 - c. Reporting and management purposes;
 - d. A merger or proposed merger, reorganization or disposal of Beacon; or
 - e. Collection information relating to the use of our website through the use of various technologies, including cookies.
- ii. Compliance with the Company’s accounting, legal, tax and administrative obligations, including:
 - a. Compliance with regulatory reporting obligations;
 - b. Order to disclose information to a court of competent jurisdiction;
 - c. Where necessary to establish, exercise or defend a legal right or for the purpose of legal proceedings; or
 - d. Compliance with the Company’s internal Know Your Customer policy, which Beacon and MUL considers a legitimate business interest to verify the identity of its customers for anti-money laundering and counter-terrorist financing and for sanctions screening purposes.
- iii. When applicants for employment, or any third-party recruiter acting on behalf of an applicant, provides Beacon with a CV and other Personal Data, such information will be used solely for the purposes of consideration for employment.

1.3 Retention Period

Beacon will retain Personal Data for such period that it is necessary for the purpose for which that personal data was collected and to the extent permitted by applicable data privacy laws and regulations, such as the Regulation (EU) 2016/679, EU General Data Protection Regulation (the “GDPR”) and California Consumer Privacy Act of 2018 Assembly Bill No. 375 (“AB 375”).



1.4 Sharing Personal Data

- 1.4.1 Beacon may share Personal Data with its subsidiaries and affiliates or other third parties but limited to the purposes outlined in Section 1.2 of this Policy, or if:
- i. Disclosure is required by law or regulation, or court or administrative order, or public authorities with whom the Company is legally required to share Personal Data, such as tax, customs, judicial or administrative authorities;
 - ii. Necessary to enable the Company to carry out its contractual obligations and enforce contracts with its customers, vendors, suppliers, service providers, or other commercial partners;
 - iii. Required by external auditors in performance of its obligations to the Company.
- 1.4.2 In the event Beacon is required to share Personal Data with a third-party data controller, the use of the Personal Data by a third party is subject to that third party's own privacy policy.
- 1.4.3 Beacon's website may contain a link to a website for which it is not responsible. As such Beacon is not responsible to such website's content or privacy practices.

1.5 Rights of Customers

A customer, vendor, or other third party has the right to:

- i. Contact Beacon to confirm whether their Personal Data was processed, and request access to that Personal Data, including types of Personal Data processed, the purpose for processing such Personal Data, and the recipients of their Personal Data;
- ii. Correct any inaccuracies or incomplete information;
- iii. Request that their Personal Data be deleted, except Beacon is not obligated to delete any Personal Data if it must be retained to comply with any legal obligations or to establish, exercise, or defend a legal claim;
- iv. Request that Beacon restrict the processing of Person Data, and object to certain uses if the Personal Data is inaccurate, processing it is unlawful, or if processing such Personal Data no longer services a particular purpose, except if the Company is required to retain the Personal Data for a legal or other obligation, or they request that their Personal Data not be deleted;
- v. Withdraw consent provided permitting Beacon to process their Personal Data, including opting out of receiving marketing correspondence from the Company; or
- vi. File a complaint with the local data protection authority.

2 Cookies

Beacon may automatically collect Personal Data when visiting the Company website including but not limited to: technical information; IP addresses; login information; and web browser information. We do not make any attempt to associate any technical information with any individual and the information is only used for statistical and other administrative purposes. For additional detail please see our Cookies Policy.