

GeoToll Privacy Policy (State of Oregon Compliant)

Effective Date: July 8, 2024

Thank you for reading GeoToll's Privacy Policy. Your privacy is of the utmost importance to us. This policy describes the information that we collect, how it is used and shared, and the choices you have regarding your information. This policy applies to users of GeoToll's services anywhere in the world, including users of GeoToll's mobile application ("app") and website. All persons who are subject to this policy are referred to as "users" for the purposes of this policy.

The privacy practices described in this policy are subject to the applicable laws in the locations where GeoToll operates. Thus, GeoToll only engages in the practices described in this policy in a particular country or region, if permitted under the laws of those places.

GeoToll provides services to users in the United States. Personal information is processed inside the United States. The data controller for the information you provide or that is collected by GeoToll or its affiliates is:

GeoToll Inc.
7284 W. Palmetto Park Road, Suite 101
Boca Raton, FL 33433

Any questions, comments or complaints about GeoToll's data practices can be submitted to GeoToll's data protection officer at dpo@geotoll.com or at (844) 391-8655.

Definitions

The following definitions apply:

Personally Identifiable Information (PII): PII identifies or describes a person or can be directly linked to a specific individual. Examples of PII include but are not limited to: a person's name, mailing address, email address, telephone number, toll tag number, license plate number, photograph of vehicle, and Travel Pattern Data.

Aggregate Data or Aggregate Information: Aggregate Data or Aggregate Information is statistical information that is derived from collective data that relates to a group or category of persons from which PII has been removed. Aggregate Data reflects the characteristics of a large group of anonymous people.

Anonymous Data or Anonymous Information: Anonymous Data or Anonymous Information is disaggregated data from which all PII has been removed, that does not identify or describe a person and that cannot be directly linked to a specific individual.

The Information GeoToll Collects

GeoToll collects information you provide when you sign up and create or update your user profile. This includes, but is not limited to, your name, email, phone number, payment or banking information, payment verification information, vehicle information including license plate number, rental car information, and other basic information. This also includes the preferences and

settings that you enable for your GeoToll account. We may collect information that you submit when you contact GeoToll customer support or otherwise contact GeoToll.

GeoToll collects information that is created when you use our services. We may collect your precise or approximate location information as determined through data such as GPS, IP address, RFID, Bluetooth and WiFi. GeoToll collects location information when the app is running in the foreground of your mobile device. GeoToll will also collect this information when the app is running in the background of your mobile device.

GeoToll collects transaction details related to your use of our services, including, but not limited to, tolling transactions, date and time the service was used, amount charged, location(s) of tolls collected, trip calculator routes, distance traveled, and payment method.

GeoToll collects information about how you interact with our service. This includes information such as access dates and times, app features or pages viewed, app crashes and other system activity, type of browser, and third-party sites or service you were using prior to interacting with our services. In some cases, we collect this information through cookies and similar technologies that create and maintain unique identifiers.

GeoToll may collect information about the devices you use to access our service, including, but not limited to, the hardware models, device IP address, operating systems and versions, software, file names and versions, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion information and mobile network information.

How GeoToll Uses Your Information

GeoToll uses the information that is collected to provide, maintain and improve our service. This includes using the information to create and update your account, verify your identity, process or facilitate payments for the service, enable features that allow you to share information with other people in your vehicle such as when you use split the toll fee, and to perform internal operations that are necessary to provide our service, including to troubleshoot software issues and operational problems, to conduct data analysis, testing and research, and to monitor and analyze usage and activity trends.

GeoToll may use your data to attempt to prevent, detect, and combat fraud or unsafe activities. In some cases, such incidents may lead to deactivation of your access to the service. GeoToll may also use information we collect to assist you when you contact our customer support services (including recordings of customer support calls after notice has been given to you and with your consent). GeoToll may use the information we collect for testing, research, analysis and product development. This enables us to improve our service and to develop new features and products, and to facilitate financial solutions in regard to our service.

GeoToll may use the information we collect to communicate with you about products, services, promotions, studies, surveys, news, updates and events. GeoToll may also use the information to promote and process contests and sweepstakes, and to provide you with relevant advertisements and content about our service and those of our business partners. You may receive some of these communications based on your profile as a user of GeoToll's service.

GeoToll may use the information that we collect to investigate or address any claims or disputes that may arise relating to your use of the service, or as allowed by applicable law, or as requested by government entities and official inquiries.

GeoToll Information Sharing and Disclosure.

GeoToll may share the information that we collect with participating tolling agencies and GeoToll business partners. If you communicate with GeoToll through a public forum such as blogs, social media or other certain public features provided within the service, your communications may be viewable by the public. GeoToll may also share information with our subsidiaries and affiliates to help us provide our service or conduct data processing on our behalf. GeoToll may provide information to its vendors, consultants, marketing partners, research firms, and other service providers or business partners. Service providers or business partners that GeoToll may share information with may include payment processors and facilitators, cloud storage providers, marketing providers, data analytics providers, research partners, vendors that assist GeoToll to enhance the security of its app, consultants, lawyers, accountants and other professional service providers, insurance and financing partners.

GeoToll may share your information if we believe it is required by applicable law, regulation, operating agreement, legal process or governmental request, or where the disclosure is appropriate due to safety or similar concerns. This may include sharing your information with law enforcement officials, government authorities, or other third parties as necessary to enforce our Terms of Service, user agreements, or other policies, to protect GeoToll's rights or property, or the rights, safety or property of others, or in the event of a claim or dispute relating to your use of our service. GeoToll may also share your information other than as described in this policy if we notify you and you consent to the sharing.

GeoToll may combine the PII provided by customers in a non-identifiable format with other information to create Aggregate Data that may be disclosed to third parties. GeoToll may use Aggregate Data and provide Aggregate Data to others for such things as managing traffic, generating statistical reports to manage program operations and for regional transportation planning, research and reporting. Aggregate Data does not contain any information that could be used to contact or identify individual customers. GeoToll may also use Anonymous data or anonymous information for corporate purpose and make it available to third parties.

GeoToll Information Retention and Deletion.

GeoToll retains user PII for as long as you maintain your GeoToll account. GeoToll shall store PII to perform essential functions including toll collection, enforcement activities, operation planning and improvements, and customer service. Once such information is no longer necessary to provide GeoToll's service or for other operational purposes, then GeoToll will take steps to prevent access to or use of such information for any purpose other than compliance with these requirements or for purposes of safety, security and fraud prevention and detection. GeoToll will discard customer PII that is unnecessary for account maintenance no more than six years after the date the PII is collected.

You may request deletion of your GeoToll account at any time by contacting GeoToll customer service at (844) 391-8655 and requesting to have your account deleted. After such request, GeoToll will delete the information that it is not required to retain. In certain circumstances, GeoToll may be unable to delete your account, such as if there is outstanding credit on your account or an unresolved claim or dispute. Once the issue preventing deletion is resolved, GeoToll will delete your account as described above. GeoToll may also retain certain information if necessary for legitimate business interests, such as fraud prevention.

User Choice.

Upon establishing a GeoToll account and accepting GeoToll's Terms and Conditions and Privacy Policy, you will be automatically Opted In to GeoToll's information sharing as described above in this Privacy Policy and in the Terms and Conditions. By Opting In to GeoToll's information sharing, you will be included in GeoToll's promotional programs which may include incentives such as providing discounted or free tolls, receiving promotional emails and materials, and other rewards. You may Opt Out of GeoToll's information sharing at any time by contacting GeoToll Customer Service at (844) 391-8655 or by contacting dpo@geotoll.com. Please note that if you choose to Opt Out of GeoToll's information sharing, you will not be included in GeoToll's promotional and rewards programs. Furthermore, if you Opt Out, we may still send you non-promotional messages such as information regarding your account. Information sharing with required entities for the Service to function, such as Tolling Agencies, or law enforcement, will still occur as in accordance with the Terms and Conditions.

Device Permissions.

Most mobile platforms have defined certain types of device data that apps cannot access without your consent. These platforms have different permission systems for obtaining your consent. The iOS platform will alert you the first time the GeoToll app wants permission to access certain types of data and will let you consent (or not consent) to that request. Android devices will notify you of the permissions that the GeoToll app seeks before you first use the app, and your use of the app constitutes your consent.

Explanations, Copies and Corrections

You may request that GeoToll provide you with a detailed explanation regarding the information GeoToll has collected about you, how GeoToll uses that information, and with whom your information was shared. You may receive a copy of the information GeoToll has collected about you and request correction of any inaccurate information that GeoToll may have about you. This information may be provided free of charge once every twelve months, and any additional requests within the twelve-month period may require you to pay an administrative fee. Certain limited circumstances may require GeoToll's denial of a request, but you may appeal this denial and receive a written decision of your appeal within forty-five days. You may make these requests by contacting GeoToll's Customer Service at (844) 391-8655 or by sending a request for this information to dpo@geotoll.com. You may also edit your personal information including your name, phone number, email, and address associated with your account through the User Info Settings of the app.

Information For California Residents.

The California Consumer Privacy Act (“CCPA”) is a privacy law that grants rights to California residents with respect to their personal information. This law became effective on January 1, 2020.

a. How we Collect, Use, and Disclose your Personal Information. The [Information GeoToll Collects](#) section describes the personal information GeoToll collects. This information is collected for the purposes described in the [How GeoToll Uses Your Information](#) section. GeoToll shares this information as described in the [GeoToll Information Sharing and Disclosure](#) section.

b. CCPA Rights for California Consumers.

- The right to know. You may request, up to twice in a 12-month period, the following information about the personal information GeoToll has collected about you during past 12 months:
 - The categories and specific pieces of personal information GeoToll has collected about you;
 - The categories of sources from which the personal information is collected;
 - The business or commercial purpose for collecting or selling the personal information;
 - The categories of third parties with whom GeoToll shares the personal information;
 - The categories of personal information that GeoToll sold about you, and the categories of third parties to whom the personal information was sold, by category or categories of personal information for each category of third parties to whom the personal information was sold;
 - The categories of personal information about you that GeoToll disclosed for a business purpose, and the categories of third parties to whom GeoToll disclosed that information for a business purpose. You may submit an [access request here](#).
- The right to delete. You may request that GeoToll delete the personal information we have collected from you, subject to certain limitations under applicable law. GeoToll may retain personal information to maintain service to your account, to comply with applicable laws and regulations and other permissible purposes. This means that we may not be able to delete all your personal information. You may be excluded from GeoToll’s promotional and rewards programs if you request the deletion of your personal information. You may submit a [deletion request here](#).
- The right to opt-out from a sale. You may request to opt-out of any “sale” of your personal information that may take place. Under the CCPA, some sharing of personal information necessary to provide you with personalized ads may be considered a “sale.” When you opt-out, GeoToll will stop sharing your personal information with some of its advertising partners. You may no longer receive personalized offers from GeoToll and you will also be excluded from GeoToll’s promotional and rewards programs as a result. You may request to opt-out by visiting our [“Do Not Sell My Personal Information”](#) page.
- Non-discrimination. The CCPA provides that you may not be discriminated against for exercising these rights.

To submit a request to exercise any of the rights described above, you may contact GeoToll at dpo@geotoll.com or at (844) 391-8655. We will need to verify your identity before responding to your request, such as verifying that the email address from which you send the request matches your email on file. Authentication based on a government-issued and valid identification document may be required.

Information for Users from the European Union.

Starting on May 25, 2018, the processing of personal data of users in the European Union or from the European Union (“EU”) is subject to the EU General Data Protection Regulation (“GDPR”). This section provides information as it relates to the rights of users from the EU, and GeoToll’s responsibilities, under this regulation.

If you are a GeoToll user from the EU, you have the following rights with respect to GeoToll’s handling of your personal information. To exercise these rights, please see below or submit your request to GeoToll’s Customer Service at (844) 391-8655, or via email to dpo@geotoll.com.

Explanation and copies of your data

You have the right to request an explanation of the information that GeoToll has about you and how GeoToll uses that information.

You have the right to receive a copy of the information that GeoToll collects about you if it’s collected on the basis of consent or because GeoToll requires the information to provide the service that you request.

Correction

You have the right to request correction of your information if GeoToll has information about you that you believe is inaccurate.

Deletion

Users may request deletion of their account at any time via GeoToll’s customer service at (844) 391-8655. GeoToll may retain certain information about you as required by law and for legitimate business purposes permitted by law.

Objections and Complaints

Users from the EU have the right to object to GeoToll’s processing of personal data including for marketing purposes based on profiling and/or automated decision making. GeoToll may continue to process your information despite the objection to the extent permitted under the GDPR. Users from the EU also have the right to file a complaint relating to GeoToll’s handling of your personal information with a supervisory authority in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the user considers that the processing of personal data relating to him or her infringes the GDPR. You may also submit questions, comments or complaints to GeoToll’s Data Protection Officer via email at dpo@geotoll.com.

Grounds for Processing.

The GDPR requires that companies processing the personal data of users from the EU do so on the basis of specific legal grounds. GeoToll processes the information of EU users based on one or more of the grounds specified under the GDPR:

The processing is necessary to provide the service and features you request. GeoToll must collect and use certain information in order to provide its service. This includes user profile information that is necessary to verify your identity, enable communications with you, and to enable you to make payments or to receive rewards. User location information is necessary to track users when they pass through tolling gantries and to make suggestions regarding travel routes; and to track miles traveled for certain Road Usage Charge mileage reporting options. Transaction information is necessary to generate and maintain in connection with your use of GeoToll's service. Your usage information is necessary to maintain, optimize and enhance GeoToll's services, including to determine incentives and to calculate costs of your trips. The collection and use of this information is a requirement for using GeoToll's mobile app.

The processing is necessary to protect the vital interests of GeoToll's users or of others. GeoToll may process personal information, including disclosing data with law enforcement officials in case of threats to safety of users or of others, or in case of misuse of the app.

The processing is necessary for GeoToll's legitimate interests. GeoToll collects and uses personal information to the extent necessary for its legitimate interests. This includes collecting and using information to prevent, detect and combat fraud in connection with use of our service. For example, GeoToll may use user profile, location, device and usage information to identify and prevent circumstances when users attempt to defraud GeoToll or tolling agencies. GeoToll may inform law enforcement officials regarding criminal acts or threats to public safety. GeoToll processes personal information to provide customer support, to optimize our service and to develop new services, for research and analytical purposes which includes analyzing data to identify trends and to tailor marketing messages to users, and to enforce GeoToll's Terms and Conditions.

The processing is necessary for the legitimate interests of other persons or parties. GeoToll collects and uses personal information to the extent necessary for the interests of other persons or the general public. This may include sharing information in connection with legal or insurance claims, or to protect the rights and safety of others. GeoToll may also process personal information when necessary in regards to a substantial public interest, on the basis of applicable laws.

The processing is necessary to fulfill GeoToll's legal obligations. GeoToll is subject to legal requirements in the jurisdictions in which it operates that may require GeoToll to collect, process, disclose and retain your personal data. GeoToll may use your information to comply with such laws to the extent they apply to your use of the GeoToll mobile app. GeoToll may also share information with law enforcement, or requests by third parties pursuant to legal processes.

GeoToll may collect and use your information on the basis of your Consent. You may revoke your consent at any time. If you revoke your consent, you will not be able to use the GeoToll mobile app service or features that require collection or use of the information we collect and use

on the basis of consent. GeoToll relies on consent in connection with data collections or uses that are necessary to enhance the user experience, to enable optional services or features, or to communicate with you. If you are a user from the EU, the following types of data collections or uses are done on the basis of your consent: location information, notifications regarding account, trips, payments, rewards, advertisements, news. Please see the User Choice section above for further information about these data collections and how to opt in or opt out of them, and the effect of opting out. GeoToll may also collect personal information about you through voluntary surveys. Your responses to such surveys are collected on the basis of consent and will be deleted once they are no longer necessary for the purposes collected.

Updates To This Policy.

GeoToll may occasionally update this Privacy Policy. If we make material changes, we will notify you of the changes through the GeoToll mobile app or through other means, such as email. It is GeoToll's sole discretion to determine what a material change is. To the extent permitted by applicable law, by using our service after such notice, you consent to GeoToll's updates to this policy. GeoToll encourages you to periodically review this policy for the latest information on our privacy practices. We will also make prior versions of our privacy policies available for review.

End of Privacy Policy