**COMMANDER NOTICE ABOUT YOUR PERSONAL INFORMATION**

1. **Overview**

This Notice helps you understand how Airspace Technologies Inc., (“**Airspace Technologies**”) collects and uses your Personal Information and your rights under the California Consumer Privacy Act (“**CCPA**”) and other applicable privacy laws. In this Notice, the terms “company,” ”us,” “we,” and “our” refer to Airspace Technologies and its affiliates and subsidiaries. “**Commander**” or “**you**” refers to independent contractors providing driving services to Airspace Technologies and Commander applicants or candidates.

1. **What Information We Collect**

As further described below, the company collects information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household (“**Personal Information**”). Personal Information ***does not*** include publicly available information from government records, deidentified information, or aggregated data.

Airspace Technologies is a shipping and logistics service provider and we rely on our proprietary technology and platform to provide time-sensitive and transparent shipping services. We use deidentified and aggregated information to support our technologies and create our applications both of which are subject to trade secret protection (“**Company Information**”). You do not have any privacy rights in connection with this Company Information.

In addition, Personal Information does not include information based on activities performed on company assets. **You do not own or have an expectation of privacy or rights under the CCPA**regarding:

1. Company Information, including information created, collected, or maintained on any technology assets owned, leased, or operated in whole, or in part, by the company. Airspace Technologies’ technology assets consist of all electronic devices, software, and means of electronic communication, including, but not limited to, computers and workstations, laptop computers, computer hardware, as well as computer software platform and applications, mobile applications, associated files, and data that grant access to services like the internet, email, phone, voicemail, and instant messages. All information created, collected, or maintained by the company’s technology assets is company property and provided to you solely for your use in conducting company business.
2. Company Information, including information Airspace Technologies collects when monitoring premises, equipment, devices, computers, network, applications, software, or similar company assets and resources, to protect its worksites, workforce members, and computer systems.

**2.1. Categories of Personal Information**

The following discusses the categories of Personal Information we collected in the last twelve (12) months. We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different purposes without first providing you notice.

* **Personal Identifiers.** We collect your name, driver’s license, secondary form of ID, username and password, email address, phone number, and mailing address from you during our application and onboarding processes and if you update your information with us. Additionally, we collect your social security number, passport number, or other I-9 documentation to show your identity and authorization to work.
* **Professional Reference Information.** We may also collect information about your professional references, such as name, email, phone number, and job position, if you provide this information in your application.
* **Characteristics of Protected Classifications Under California or Federal Law.** We may collect your date of birth, age, gender identity, sexual orientation, racial or ethnic origin, disability information, genetic information, marital status, or pregnancy and related information, if you provide this information as part of your application, during onboarding, or while working at Airspace Technologies. We may also collect this information in connection with your TSA application, which we require from all of our Commanders.
* **Audio, Visual, or Similar Information.** We may collect information that may be used to identify you to other members of the workforce or customers, such as your selfie photo.
* **Financial Information.** We collect financial information, including when you provide us your bank account information to pay you for services provided.
* **Commercial Information.** We collect commercial information from you, such as information about your smart phone, what vehicle you will drive for Airspace Technologies, and your automobile insurance information.
* **Geolocation Information.** We collect geolocation information from Commanders when you use our Driver Partner App to drive for us.
* **Inferences and Preferences.** We may collect information about your preferences, including your application settings, preferred shifts, and communications preferences.
1. **How We Use the Information We Collect**

We use the Personal Information we collect for the following business and commercial purposes:

* **Recruiting and Onboarding.** We use Personal Information to support our recruiting efforts, complete new hire paperwork, and enroll you in our systems. We also use your Personal Information to provide you with access to our Driver Partner App.
* **Payroll.** We use Personal Information to manage and pay you for services provided.
* **Business Operations.** We use Personal Information to provide shipment updates in real-time and ensure our deliveries are effectively routed to the right Commanders. We also use Personal Information to maintain files and otherwise run our day-to-day operations.
* **Improve Our Software Application and Technology.** We use the information we collect to make improvements to our software application, better understand our business models, and develop our delivery services.
* **Background Checks.** We may use the Personal Information we collect to complete background checks on our Commanders to verify your identity, check for criminal and driving history, and confirm the validity of your application.
* **Communicate With You.** We use the Personal Information we collect to communicate with you about available jobs, check in with Commanders on deliveries, and provide route information.
* **Government Reporting.** We use the Personal Information we collect to comply with applicable laws.
1. **Biometric Information Disclosure**

As discussed in the above section on the Personal Information we collect, Airspace Technologies may require Commanders using the Driver Partner App to upload a profile selfie photo. Airspace Technologies may use and share this photo to identify you to our customers.

**4.1. Biometric Information Retention Policy**

Airspace Technologies will retain your selfie photo for as long as you maintain a profile on our Driver Partner App and provide delivery services for us. The photos you upload will be stored on our Driver Partner App until your profile is deleted. Should you cease driving for us, pursuant to your request or as required by applicable law, we will permanently delete any selfie photos stored on our systems.

1. **Additional Rights Under California Law**

At this time, the CCPA does not afford you the right to make requests regarding your Personal Information. Airspace Technologies will inform you about any policies and procedures related to such rights if they become available.

1. **How We Retain Your Personal Information**

To the extent permitted by applicable law, Airspace Technologies will retain your Personal Information for as long as reasonably necessary to fulfill the purposes for which it was collected, including to meet any legal, accounting, or other reporting requirements or obligations.

1. **How You Are Protected Against Discrimination**

Airspace Technologies will not unlawfully discriminate against you for exercising any of your rights under the CCPA. This commitment applies to all persons involved in our operations and prohibits unlawful discrimination by any member of Airspace Technologies’ workforce, including supervisors and coworkers.

1. **Disclaimer**

Nothing in this Notice restricts our ability to:

* Comply with federal, state, or local laws;
* Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;
* Cooperate with law enforcement agencies concerning conduct or activity that the business, service provider, or third party reasonably and in good faith believes may violate federal, state, or local law;
* Exercise or defend legal claims;
* Detect security incidents and protect against fraudulent or illegal activity and prosecute those responsible for such activity; or
* Transfer Personal Information as part of a merger or acquisition, dissolution, bankruptcy, or any other transaction in which a third party assumes control of all or part of Airspace Technologies.
1. **Changes to This Notice**

This Notice is reviewed and updated annually to ensure it accurately captures our practices and procedures. The effective date of this version is posted below.

1. **Resolving Concerns and How to Contact Us**

If you have questions or concerns regarding this Notice or the handling of your Personal Information, please contact Lucky@airspacetechnologies.com or 844-208-3330.

***EFFECTIVE DATE:*** *February 26, 2021*

**COMMANDER CONSENT**

I have read and understood the above disclosure concerning Airspace Technologies collection, use, disclosure, and retention of my Personal Information, including but not limited to geolocation information and any profile photos I upload for identification purposes. I hereby consent and authorize the collection, use, disclosure, and retention of my Personal Information. I understand that I can revoke my consent at any time, but understand that I may not be permitted to access the Driver Partner App or provide driving services if I revoke this consent.

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