

# THE PASHA GROUP PRIVACY POLICY

**Effective date: January 1, 2020**

The Pasha Group (“Pasha”, “us”, “we”, or “our”) is committed to protecting the privacy of your personal information. Pasha has created this Privacy Policy to inform you of our policies regarding the collection, use and disclosure of personal information.

This Privacy Policy applies to all personal information collected about you by Pasha when you do any of the following:

- (i) use our services;
- (ii) participate in any written, electronic, and oral communications with us;
- (iii) use our websites <http://www.pashagroup.com>, <http://www.pashahawaii.com> and all corresponding webpages and websites that link to this Privacy Policy (the “Websites”). The Websites contain links to other websites over which we have no control. We are not responsible for the privacy policies or practices of other websites that you visit though a link on the Websites.

We may update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this webpage. We will provide a prominent notice on this webpage prior to the change becoming effective and update the effective date at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **1. Personal Information We Collect From You**

We collect personal information when you communicate with us about or use our services or submit personal information when requested on the Websites. Personal information is any information that relates to you, identifies you personally or could be used to identify you, such as your name, email address, phone number and physical address. The types of personal information that we may collect about you include:

### **a) Information You Provide to Us**

- Contact information such as your name, email, phone, and address.
- User identifications and passwords that may be used to access our services.
- Shipping information, including account numbers, information about the contents of a shipment, origination and destination addresses.
- Payment information, including credit card and bank account information and billing addresses.

### **b) Information You Provide to Our Affiliates and Subsidiaries**

We may receive some or all of the personal information identified above from a company controlled by or under common control with Pasha.

## **2. Cookies and Other Tracking Technologies**

We use cookies and similar tracking technologies to track the activity on our Websites. Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking

technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyze our Websites.

a) How We Use Cookies

Generally, we use first-party and third-party cookies; (i) to make our Websites function properly, (ii) to provide a secure browsing experience during your use of our Websites, (iii) to collect passive information about your use of our Websites, (iv) to help us improve our Websites; to remember your preferences for your convenience; and (v) to advertise our services to you and measure how you interact with our marketing campaigns.

b) Types of Cookies on Our Websites

We use the following types of cookies on our Websites:

- **Strictly Necessary Cookies** – These cookies are essential because they enable you to use our Websites. For example, strictly necessary cookies allow you to access secure areas on our Websites. Without these cookies, some services cannot be provided. These cookies do not gather information about you for marketing purposes. This category of cookies is essential for our Websites to work and they cannot be disabled.
- **Functional Cookies** – We use functional cookies to remember your choices so we can tailor our Websites to provide you with enhanced features and personalized content. For example, these cookies can be used to remember your name or preferences on our Websites. We do not use functional cookies to target you with online marketing. While these cookies can be disabled, this may result in less functionality during your use of our Websites.
- **Performance or Analytic Cookies** – These cookies collect passive information about how you use our Websites, including webpages you visit and links you click. We use the information collected by such cookies to improve and optimize our Websites. You can disable these cookies.
- **Targeting Cookies** – You must opt-in to receive these cookies on our Websites. These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant advertising on other sites. Targeting cookies do not store personal information directly, but are based on uniquely identifying your browser and device. If you do not opt-in to receive these cookies you will experience less targeted advertising.
- **Third-Party Cookies** – These are cookies provided by third-party service providers and belong in one of the cookie categories described above. These third-party providers process your personal information on our behalf pursuant to our instructions and obligations consistent with this Privacy Policy.

c) Analytics

We use Google Analytics to monitor and analyze the use of our Websites. Google Analytics is a web analytics service offered by Google LLC (“Google”) that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

For more information on the privacy practices of Google, please visit the web page: <https://policies.google.com/privacy?hl=en>. A Google Analytics Opt-out browser plug-in provides visitors with the ability to prevent their data from being collected and used by Google Analytics, available at: <https://tools.google.com/dlpage/gaoptout?hl=en>.

#### d) Other Tracking Technologies

To see how our Websites are performing we sometimes use conversion beacons, tags, scripts and pixels, which fire a short line of code to tell us when you have clicked on a particular button or reached a particular page. We also use these tracking technologies to analyze usage patterns on our Websites. The use of these technologies allows us to record that a particular device, browser, or application has visited a particular webpage.

#### e) Your Choices

Your browser may provide you with the option to refuse some or all browser cookies. You may also be able to remove cookies from your browser. You can exercise your preferences in relation to cookies served on our Websites by taking the steps below:

- **First-Party Cookies** – You can enable, disable or delete our cookies through the browser you are using to access our Websites. To do this, follow the instructions provided by your browser (usually located within the “Help”, “Tools” or “Edit” settings). Please note, if you set your browser to disable cookies, you may not be able to access secure areas of our Websites and parts of the Websites may not work properly for you.
- **Third-Party Cookies** – Modern browsers also allow you to block third-party cookies using the steps described above.
- **Do Not Track** – We do not support Do Not Track signals. Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

### **3. How We Use Your Personal Information**

We will only use your personal information as described in this Privacy Policy or as disclosed to you prior to such use.

#### a) To Provide and Maintain our Service

We will use your personal information to provide information or deliver services that you request. If the service is to be performed by a third party, then we will disclose the applicable information to the third party performing the services as required for them to perform the services.

#### b) To Provide You with Service-Related Communications

We will send you administrative or account-related information to notify you about changes to the provision of our services. Such communications may include information about the status of your shipment, confirmations of your transactions, claims information, security updates or other relevant transaction-related information. We process your contact information to send you such communications. Service-related communications are not promotional in nature. You are not able to unsubscribe from such communications, otherwise you may miss important developments relating to your account or the services.

#### c) To Provide Customer Support or Respond to You

We collect any information that you provide to us when you contact us, such as with questions, concerns, feedback, disputes or issues. Without your personal information, we cannot respond to you or ensure your continued use and enjoyment of our services.

d) For Internal Use

We will use your information to gather analysis or valuable information so that we can improve our services and to detect, prevent and address technical issues.

e) To Enforce Compliance with Our Agreements or Policies

We process your personal information to investigate, prevent or mitigate violations of our agreements or policies; enforce our agreements with third parties and business partners; and, as applicable, collect fees based on your use of our services. We cannot perform our services in accordance with our terms, agreements or policies without processing your personal information for such purposes.

f) To Maintain Legal and Regulatory Compliance

Our services are subject to certain laws and regulations which may require us to process your personal information. For example, we process your personal information to fulfill our business obligations, or as necessary to manage risk as required under applicable law. Without processing your personal information for such purposes, we cannot perform the services in accordance with our legal and regulatory requirements.

**4. Disclosure of Your Personal Information**

We may disclose your personal information as described below.

a) Within Our Corporate Organization

Pasha is a part of a corporate organization that has many legal entities, business processes, management structures and technical systems. Pasha may share your personal information with this organization in order to provide you with the services and take actions based on your request.

b) Service Providers

We may employ third-party companies and individuals to assist in providing the services on our behalf, or assist us in analyzing how our services are used. These third parties have access to your personal information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

c) Mergers and Acquisitions

We may share your information in connection with or during the negotiation of a merger, acquisition or asset sale.

d) Disclosure for Law Enforcement

Under certain circumstances, Pasha may be required to disclose your personal information if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency). Pasha may disclose your personal information in the good faith belief that such action is necessary to:

- comply with a legal obligation;
- protect and defend the rights or property of Pasha;
- prevent or investigate possible wrongdoing in connection with the services;
- protect the personal safety of users of the services or the public; and
- protect against legal liability.

**5. Security of Data**

The security of your data is important to us but no method of transmission over the Internet or

electronic storage is guaranteed to be secure. Our security measures include industry-standard, reasonable physical, technical and administrative measures to prevent unauthorized access to or disclosure of your information. We cannot guarantee the absolute security of your information.

## **6. Retention of Data**

Pasha will retain your personal information as necessary for the purposes set out in this Privacy Policy. We will retain and use your personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

## **7. Children's Privacy**

Our services are not directed to anyone under the age of 18. We do not knowingly collect personal information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us. If we become aware that we have collected personal information from children without verification of parental consent, we take steps to remove that information from our servers.

## **8. California Privacy Rights**

If you are a California resident, you have rights in relation to your personal information which are provided by the California Consumer Privacy Act (“CCPA”).

- Right to Know – You have the right to request: (i) the categories of personal information we have collected about you, (ii) the categories of sources from which personal information is collected, (iii) the business or commercial purpose for the information collection, (iv) the categories of third parties with whom we have shared personal information, and (v) the specific pieces of personal information we hold about you during the 12 months before your request. To request this information please submit a Data Request by [clicking here](#) or call +1 (833) 796-0136 PIN 643423. We may ask you to confirm the details of personal information we already have on file for you in order to verify your identity before completing our response to your request.
- Right to Delete – You have the right to request that we delete any personal information we have collected from you or maintain about you, subject to certain exceptions. To request deletion of your information please submit a Data Request by [clicking here](#) or call +1 (833) 796-0136 PIN 643423. We may ask you to confirm the details of personal information we already have on file for you in order to verify your identity before completing our response to your request.
- Right Against Discrimination – We will not discriminate against you, and are not allowed to discriminate you, for exercising your rights under the CCPA.

## **9. Contact Us**

If you have any questions about this Privacy Policy, please contact us by email at [privacy@pashanet.com](mailto:privacy@pashanet.com).