

FLEETCOR U.S. Privacy Policy

This policy applies to FleetCor Technologies, Inc. and its U.S. subsidiaries (“FleetCor” or “we,” “our” or “us”). We take the privacy of your Personal Information very seriously. This Privacy Policy describes our privacy practices for information that we collect:

- through this website and any other websites owned or controlled by FleetCor which reference or link to this policy (the “Websites”);
- through the software applications made available by us for use on or through computers and mobile devices (the “Apps”);
- when you or your company uses, purchases, obtains or considers our products and services, included our electronic payment services, fuel payment services, and lodging services (the “Services”);
- when you communicate with us in any way including by calling or emailing our customer service department, connecting with us on social media, post to our social media pages and tagging us in your social media posts (collectively, the “Communications”); and
- when you respond to our advertisements or participate in surveys or participate in our contests or promotions (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.”

Additional privacy disclosures may apply in connection with your use of a specific product or relationship you may have with one of our lines of business. In that case, the privacy notice that you receive for that product or relationship will control our use of your information and your privacy rights. In addition, the Card Privacy Policy posted at www.cardholder.comdata.com applies to you if you are or have been one of our consumer card customers or applied for one of our consumer card products.

1. ACCEPTANCE OF THIS PRIVACY POLICY

By using, visiting or participating in the Company Activities and Interactions, you agree to the terms and conditions of this Privacy Policy. If you do not accept this Privacy Policy, you are not authorized to use, visit or participate in the Company Activities and Interactions and must discontinue using, visiting or participating in the Company Activities and Interactions immediately.

2. COLLECTION OF PERSONAL INFORMATION

“Personal Information” means data that identifies you as an individual or relates to an identifiable individual. We collect Personal Information at every touch point or customer interaction. In conducting every aspect of our business, we may collect Personal Information. We also collect Personal Information when you use, visit or participate in the Company Activities and Interactions. Such information may include, without limitation: your first, middle and last name; maiden name; alias; marital status; date and place of birth; current and former home addresses; email addresses; telephone numbers; employment history; current and former employer names and addresses; state/governmental identification number; tax and withholding information; social security number; credit or debit card number or other payment method; billing information; emergency contact information; geolocation information; marketing and communications preferences; and other types of information that you choose to provide to us or that we may obtain about you.

We collect Personal Information in a variety of ways:

2.1. Company Activities and Interactions

FleetCor collects 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: conduct business with FleetCor; use, purchase, obtain or consider our Services; request information or materials from us; enter promotions, sweepstakes or contests offered by FleetCor; register on the customer portal; make payments to us for our Services; communicate with us in any way about questions or other matters, connect with us on social media, post to our social media pages or tag us in your social media posts; or when you respond to our advertisements

2.2. Customer Care Centers

We collect Personal Information when you communicate with us in any way including when you communicate with us by email, fax or via online chat services or contact customer service. These communications may be recorded for purposes of quality assurance and training.

2.3. Social Media

If you choose to participate in FleetCor-sponsored social media activities or offerings, we may collect certain 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. 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.

2.4. Application for Employment

If you choose to apply online for employment with us, we collect personal information about you to assess your suitability for employment.

3. COLLECTION OF OTHER INFORMATION

When you visit and interact with the Websites or Apps, we collect information that does not directly identify you ("Other Information"). Such information may include, without limitation, data and information that: is aggregated (that is, relates to a group of individuals) by FleetCor or a third party, is not linked to personal information, information collected by Cookies, the type of computer or device you use, the operating system you use (e.g., Microsoft Windows, Mac OS or Google Chrome), the type of browser you use (e.g., Firefox, Chrome, Internet Explorer or Safari), your activities while visiting or using the Websites and the content you access or view, the time of your visit to or use of the Websites, the pages you visit and the time spent on the pages, your general geographic location such as the city from which your computer or device is connecting to the Internet, information regarding the websites you visit prior to and after visiting the Websites, and information regarding your Internet location when you see FleetCor's ads and whether you click on such ads.

We collect Other Information in a variety of ways:

3.1. Your Browser or Device

We collect certain data through your browser or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system

name and version, device manufacturer and model, language, and internet browser type you are using. We use this data to ensure that the Online Services function properly.

3.2. Your Use of the Apps

We collect certain data when you download and use an App, such as App usage data, the date and time the App on your device accesses our servers and what data and files have been downloaded to the App based on your device number.

3.3. Collection Technology

We use cookies and similar technologies to collect information about your activity, browser and device when you visit our Websites or websites where our ads appear. A cookie is a small data file that a website transfers to your computer's hard drive. 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. Similar technologies such as pixel tags, web beacons, clear GIFs, links in emails, JavaScript, device IDs assigned by Google or Apple, web storage, unique advertising identifiers and device ID technology also do the same thing. We use the term "Collection Technology" in this Privacy Policy refer to all technologies that collect information in this way.

We use the information collected through Collection Technology for security purposes, to facilitate navigation, to display data more effectively, to personalize your experience while using the Websites and to recognize your computer to assist your use of the Websites. We also gather statistical data to continually improve design and functionality, understand how the Websites are used and assist us with resolving questions. Collection Technology further allows us to select which advertisements or offers are most likely to appeal to you and display them while you are using the Websites or to send marketing emails. We also use Collection Technology to track responses to online advertisements and marketing emails.

If you want to remove or block Collection Technology from your device at any time, you can update your browser settings (consult your browser's "help" menu to learn how to remove or block Cookies). FleetCor is not responsible for your browser settings. You can find good and simple instructions on how to manage Collection Technology on the different types of web browsers at www.allaboutcookies.org. You can learn more about interest-based advertising and how to opt out of our vendors' and other advertisers' use of Collection Technology to tailor content or advertising to you by visiting <http://optout.networkadvertising.org/#/> or <http://www.aboutads.info/choices>. At this time, we do not respond to browser Do Not Track signals or other "opt out" setting or feature that may be offered by your browser

4. HOW WE USE AND SHARE PERSONAL AND OTHER INFORMATION

FleetCor may use your Personal Information and Other Information to: (i) provide you with Services or process transactions that you have requested, (ii) carry out the purposes for which you provided the information, (iii) improve our Services, (iv) process any applications, forms, requests, inquiries, or other information you submit through the Website or any other Communication, (v) manage our contractual relationship with you; (vi) administer and process payments, (vii) attend to tasks relating to your transactions with FleetCor, (viii) provide customer service, (ix) personalize the Services according to your personal preferences; (x) update account information, (xi) inform you of events, programs, products or services that may be of interest to you, (xii) customize the content or functionality of Website to your preferences, (xiii) respond to your Communications, (xiv) communicate with you about the Website, our Services and/or other activities related to the Website or Services; (xv) conduct data analysis, audits, security and fraud monitoring and prevention; (xvi) developing new goods and services; (xvii) enhancing,

improving or modifying our Services; (xvi) identifying usage trends; (xvii) determining the effectiveness of our promotional campaigns; and (xviii) operating and expanding our business activities.

We may use information we have collected and aggregated, or anonymized Personal Information received from third parties, to understand more about our users (for example, we may use aggregated information to calculate the percentage of our users who have a particular telephone area code). This includes demographic data, inferred commercial interests, and other information we may collect from you or from third parties.

Because Other Information does not personally identify you, such information may be disclosed for any purpose where permitted by law. In some instances, we may combine Other Information with personal information. If we do combine any Other Information with personal Information, the combined information will be treated by us as Personal Information in accordance with this Statement.

Your personal information will be intentionally disclosed as follows:

4.1. Disclosures to Third-Party Service Providers

FleetCor may provide your Personal Information and Other Information to third parties who work on behalf of or with FleetCor including, without limitation, third-party service providers, agents, vendors, payment processors, consultants, and attorneys (“Service Providers”). These Service Providers may use your personal information to help FleetCor administer the Websites and Apps and FleetCor’s business or the Services, including, but not limited to, assistance in administering and processing payments and orders, maintaining databases, assisting with billing, providing credit, complying with governmental or quasi-governmental reporting, collection services, providing customer service, or communicating with you about offers, events, promotions, sweepstakes or surveys. We may also share your personal information with Service Providers to provide general functions on our behalf relating to the Services. Generally, our Service Providers are contractually obligated to protect your personal information and may not otherwise use or share your personal information, except as may be required by law.

4.2. Disclosures Under Special Circumstances

FleetCor may provide information about you in response to or to cooperate with law enforcement, government, quasi-governmental and public agency requests or reporting requirements, subpoenas, court orders or legal process; to respond to your requests for customer service or other information; to establish or exercise our legal rights or defend against legal claims; to enforce our terms and conditions; or to protect the safety or property of FleetCor or others. FleetCor also may provide information about you if FleetCor believes it is necessary to share information in order to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required or permitted by law.

4.3. Major Transactions

FleetCor reserves the right to transfer any and all information, including, without limitation, personal information, to any FleetCor affiliate or a third party or successor in the event of any reorganization, conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations (including, without limitation, in connection with bankruptcy or any similar proceedings).

5. LINKING 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 FleetCor, however, we are not responsible for the privacy practices of those Other Links and Sites or the content provided thereon. Collection Technology also may be used by some of those Other Links and Sites. Therefore, the privacy policies with respect to these areas may differ from those applicable to our Websites and Apps and we encourage you to review the privacy policies of each of those Other Links and Sites.

6. ANALYTICS SERVICES

The Websites may use analytics services provided by third parties, such as Google Analytics, Adobe Analytics, and Moz, among others (Data Analytics Providers). These Analytics Companies use Collection Technology to collect and store information about the use of the 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 read Moz’s privacy policy, which applies to Moz analytics, at <http://moz.com/privacy-policy> You can learn more about Adobe and opt out by visiting <http://www.adobe.com/privacy/opt-out.html>.

7. 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 the Websites or the 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 and <http://www.aboutads.info/>. To opt out of the practice, you may download the AppChoices app at www.aboutads.info/appchoices.

8. PROTECTION OF PERSONAL INFORMATION

FleetCor stores Personal Information and Other Information using reasonable physical, technical and administrative safeguards. Please be aware that the Websites, Apps, and data storage are run on software, hardware and networks, any component of which may, from time to time, require maintenance or experience problems or breaches of security beyond FleetCor’s control. In addition, no transmission of data over the internet is guaranteed to be completely secure. It may be possible for third parties not under the control of FleetCor to intercept or access transmissions or private communications unlawfully. FleetCor cannot ensure or warrant the security of any information you transmit to us over the internet.

9. PRIVACY RIGHTS OF CALIFORNIA RESIDENTS

Effective January 1, 2020, the California Consumer Privacy Act (CCPA) permits consumers who are California residents to (a) ask a covered business which categories or pieces of personal information it collects and how the information is used; (b) request deletion of the information; and (c) opt out of the sale of such

information, if applicable. The CCPA sets forth certain exceptions to these general provisions, including for personal information collected, processed, sold or disclosed by financial institutions pursuant to specified federal law, for personal information provided in the context of certain business to business transactions, and when we are required to retain information to comply with other laws. To contact us with questions about our compliance with the CCPA, email us at privacy@fleetcor.com. Please note, consumers will not receive discriminatory treatment for the exercise of privacy rights conferred by the CCPA.

10. CHILDREN

The Website is not designed to solicit information from individuals under the age of 16. We do not knowingly collect or store any personal information from anyone under the age of 16. If we become aware that we have collected or stored personal information from an individual under age 16, we will remove his or her personal information from our files. If you are a parent or guardian and believe FleetCor may have inadvertently collected personal information from your child, please notify us immediately by sending an email to privacy@fleetcor.com.

11. 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 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.

12. 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 contacting us at: privacy@fleetcor.com.

13. 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 Statement on any of our Websites. Your use of the Services following these changes means that you accept the revised Privacy Statement.

14. CONTACT US

If you have any questions or concerns about this Privacy Policy or our privacy practices, please contact us at privacy@fleetcor.com.

15. 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.

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