

## **Website Privacy Policy**

Commtrex Inc. (“Commtrex”) strongly believes in maintaining the privacy of nonpublic personal information we collect from individuals who visit our corporate website at [www.commtrex.com](http://www.commtrex.com) and/or the Commtrex Exchange at <https://exchange.commtrex.com> (collectively referred to herein as the “Website”). We want you to understand how and why we collect, use and disclose the personal information about you on our Website. This Website Privacy Policy (referred to herein as “Privacy Policy” or “Policy”) provides you with information concerning our practices and procedures as they relate specifically to information we collect at the Website. If you have additional questions or would like further information on this topic, please feel free to write to our Webmaster at [webmaster@commtrex.com](mailto:webmaster@commtrex.com). We may update this Policy from time to time, so please check this Policy periodically for changes.

### **SUMMARY**

This Privacy Policy notifies you of:

- what personally identifiable information of yours is collected from you through Commtrex’s Website,
- the organization collecting the information,
- how the information is used,
- with whom the information may be shared,
- what choices are available to you regarding collection, use and distribution of the information,
- the kind of procedures we employ in an effort to hinder the unauthorized access, deletion, alteration, use or disclosure of information you provide to Commtrex or any Commtrex Website, and
- how you can correct any inaccuracies in the information you provide to Commtrex.

### **CONTACT**

If you have questions or concerns regarding this Privacy Policy, you should contact Commtrex by calling (713) 280-7987, emailing [info@commtrex.com](mailto:info@commtrex.com), or by writing us at:

Commtrex, Inc.  
410 Pierce Street  
Houston, TX 77002

### **PERSONAL INFORMATION WE COLLECT AND USE AT THE WEBSITE**

We gather customer information needed to provide you with superior service, communicate offers on products and services that we believe will be of interest to you and to administer our business.

We do not collect any personal information about you at our Website unless you choose to provide it to us voluntarily. We define “personal information” as information that is unique to you and might include your name, your company name, your phone number, name, age, birth date, address, credit card number, or other financial information. Generally, we need this information in order to be able to communicate with you about our products and services, including any listings that you choose to post on our Website or which you are interested in accessing through the Website. Other examples of

when we may ask you to voluntarily provide personally identifiable information include if you subscribe to our email program (information such as your name and e-mail address), or choose to provide us with your preference information (such as interests relating to rail car types and preferences, product preferences, and items purchased), where applicable. If you encounter a screen or page that requests information you do not want to share with us, do not enter the information and do not proceed with that screen or page.

If you do provide us with personal information, we will only use it for the purposes described where it is collected, and we will not sell, license, transmit or disclose this information outside of Commtrex unless (1) you expressly authorize us to do so, including among other things, in order to provide our products or services to you, (2) it is necessary to allow our trusted service providers or agents to provide services for us, (3) it is necessary in connection with a sale of all or substantially all of the assets of Commtrex or the merger of Commtrex into another entity or any consolidation, share exchange, combination, reorganization, or like transaction in which Commtrex is not the survivor, or (4) otherwise as we are required or permitted by law.

### **SOCIAL MEDIA PLATFORMS AND WEB SITES**

Any information, communications, or material of any type or nature that you submit to our Website (including, but not limited to any Commtrex web site contained on a social media platform or web site such as Facebook or Twitter) by email, posting, messaging, uploading, downloading, or otherwise (collectively, a "Submission"), is done at your own risk and without any expectation of privacy. Commtrex cannot control the actions of other users of any social media platform or web site and Commtrex is therefore not responsible for any content or Submissions contained on such sites and platforms. By visiting any Commtrex web site that is contained on a social media platform or web site, you are representing and warranting to Commtrex that you have reviewed the applicable privacy policy and terms of use of such platform or web site and that you will abide by all such provisions contained therein.

Additionally, in the event that Commtrex offers a message board or any other interactive or social-type feature on a web site administered directly by Commtrex, please be aware that these areas may allow you to publicly post, and share with other users, certain messages, content, or other information. Although Commtrex may take certain precautions to protect those who use these areas of an Commtrex web site, we encourage you to be wary of giving out any personal information in such public forums. The information you post can be collected and used by people you don't know. We cannot guarantee the privacy and safety of these areas and are therefore not responsible for any information you choose to post. Your use of these features is fully at your own risk.

### **INFORMATION COLLECTED FROM CHILDREN**

We are strongly committed to preserving online privacy for all the visitors of the Website, including children. [www.commtrex.com](http://www.commtrex.com) are general audience sites, and we do not knowingly collect information about children or sell products to children. Consistent with the Children's Online Privacy Protection Act, we will not knowingly collect any information from children under the age of 13. If you are under the age of 13, you must ask your parent or guardian to assist you in using [www.commtrex.com](http://www.commtrex.com) and <https://exchange.commtrex.com>. Furthermore, we may restrict entries to any contests, sweepstakes or promotions to entrants who are at least 18 years of age.

## **EMAIL**

We appreciate your questions and comments about the Website and services and welcome your email messages to mailboxes listed on our web site. We will share your messages with those within our organization who are most capable of addressing the issues contained in your message. We will keep a copy of your message until we have had an opportunity to address your concerns. We may archive your message for a certain period of time or discard it, but your email address will not be used for any other purpose.

## **CONFIDENTIALITY AND SECURITY**

We restrict access to personal information collected about you at the Website to our employees, our affiliates' employees, or others who need to know that information to provide services to you or in the course of conducting our normal business operations. While no web site can guarantee security, we maintain appropriate physical, electronic, and procedural safeguards to protect your personal information collected via the Website. We protect our databases with various physical, technical and procedural measures and we restrict access to your information by unauthorized persons. We also advise all Commtrex employees about their responsibility to protect customer data and we provide them with appropriate guidelines for adhering to our company's business ethics standards and confidentiality policies.

## **THE RIGHT TO VERIFY THE ACCURACY OF INFORMATION WE COLLECT**

Keeping information accurate and up to date is important to us. You can personalize your experience at the Website by becoming a registered user. Once registered, you can review and maintain your account information at any time, by clicking on the <https://exchange.commtrex.com/manage>. Your account information is secure and is accessible by using a password that you select. Do not share your password with anyone. To become registered user at or to modify your current preferences, click here <https://exchange.commtrex.com/register>.

## **LINKS TO OTHER SITES**

For your convenience we may provide links to other web sites and web pages that we do not control. We cannot be responsible for the privacy practices of any web sites or pages not under our control and we do not endorse any of these web sites or pages, the services or products described or offered on such sites or pages, or any of the content contained on those sites or pages.

## **USE OF "COOKIES" OR OTHER DATA COLLECTION TOOLS**

A cookie is a piece of information which a web server may place on your computer when you visit a web site. Cookies are commonly used by web sites to improve the user experience and have not been known to transmit computer viruses or otherwise harm your computer. Many cookies last only through a single web site session, or visit. Others may have an expiration date, or may remain on your computer until you delete them.

We may use cookies for a number of purposes - for example, to maintain continuity during a user session, to gather data about the usage of the Website for research and other purposes, to store your preferences for certain kinds of information and marketing offers, or to store a user name or encrypted identification number so that you do not have to provide this information every time you return to the Website.

Our cookies will track only your activity relating to your online activity on the Website, and will not track your other Internet activity. Our cookies do not gather personally identifiable information.

You can decide if and how your computer will accept a cookie by configuring your preferences or options in your browser. However, if you choose to reject cookies, you may not be able to use certain of our online products and services or web site features.

We may occasionally use other companies to set cookies on our Website and gather cookie information for us. In some cases, we may also use another company to operate web servers or process credit card purchases for our Website. We use the cookie information gathered by these companies in the same manner as stated above.

In addition to the information we collect from cookies, we also obtain information which you provide to us online - for example, when you sign up for product updates or when you purchase products or otherwise communicate with us. In some cases, we retain both the cookie information and/or the information you provide to us online - for example, to complete a transaction you requested or to keep historical records of your past transactions. In other cases, we only retain the cookie and/or online information you give us if you request us to do so for your use in subsequent sessions.

An IP address is a unique identifier that certain electronic devices use to identify and communicate with each other on the Internet. When you visit our Website, we may view the IP address of the device you use to connect to the Internet. We use this information to determine the general physical location of the device and understand from what regions of the world the visitors to the Website come. We also may use this information to enhance the Website.

The Website uses Google Analytics, which is a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help analyze how individuals use the services. The non-personal information generated by the cookie about your use of the Website will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Website and Apps, compiling reports on Website and Apps activity for our purpose, evaluation and providing other services relating to the Website and Apps activity and Internet usage. Google will not associate your IP address with any other data held by Google. You may disable cookies within your browser as described above, however please note that if you do this you may not be able to use the full functionality of the Website or the Apps. By using this Website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. For certain browsers, you can also prevent Google from collecting information (including your IP address) via cookies and processing this information by downloading this browser plug-in and installing it: <http://tools.google.com/dlpage/gaoptout>.

## **PROMOTIONAL EMAILS**

From time to time Commtrex may send you e-mails with service or promotional offers. If you would no longer like to receive such e-mails or other messages from the Website please follow the "Unsubscribe" instructions included in the email. Your e-mail address will be removed from our marketing list. Please allow us a reasonable period of time in order to satisfy your request, as some promotions may already be in process.

### **SPECIAL STATEMENT FOR JOB APPLICANTS**

Any personal information you provide us when applying for a career position with our company will be used solely to consider and act upon your application. We may retain your personal information for a period of time, but only for as long as necessary for such purposes. We may disclose your personal information to our subsidiaries, affiliates, and agents for the purpose of evaluating your qualifications for the particular position you applied for, or other available positions. We may also disclose your personal information to third parties hired by us to collect, maintain, and analyze candidates for career positions.

### **VISITING THE WEBSITE FROM OUTSIDE OF THE UNITED STATES**

If you are visiting the Website from outside the United States, please be aware that your information may be transferred to, stored or processed in the United States, where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country, but please be assured that we take steps to protect your privacy. By using our services, you understand that your information may be transferred to our facilities and those third parties with whom we share it as described in this Policy.

### **CHANGES TO OUR WEBSITE PRIVACY POLICY**

We reserve all rights to modify, delete or append portions of this Policy at any time and from time to time. Any changes will be effective immediately and binding on all visitors to the Website when we post them. The most recent version of the Policy is reflected by the version date located at the bottom of this Policy. We recommend you review the Privacy Policy from time to time during your visits to the Website and note any changes before your continued use of the Website. Each time you access the Website, you agree to be bound by the Privacy Policy. Accordingly, your continued use of the Website after we post any revisions to the Privacy Policy constitutes your acceptance of the revised terms and conditions.

Last Revised: October 26, 2015