

# TRANSITARIUS PRIVACY POLICY

Effective Date: July 20, 2024.

## 1 **Introduction.**

This Privacy Policy describes how Parthenon Technologies, Inc. (“**Transitarius**,” “**we**,” “**our**,” or “**us**”) collects, uses, and discloses personal information about you as well as your rights and choices regarding such information. For purposes of this Privacy Policy, unless otherwise stated, “**information**” or “**personal information**” means information relating to an identified or identifiable individual, and does not include aggregate information or information that does not identify you.

Some regions provide additional rights by law. For region-specific terms, please see below.

- [California](#)
- [Nevada](#)
- [Virginia](#)

For our contact details, please see the “Contact Us” section below.

## 2 **Applicability.**

Data protection laws distinguish between entities that control the purposes and means of processing information and entities that process information on behalf of other entities.

This Privacy Policy applies to information where we control the purposes and means of processing, and governs any online services and applications we control that link to this Privacy Policy (the “**Service**”). Please remember that your use of the Service is also subject to our [Terms of Use](#).

This Privacy Policy does not apply to the processing of information by third parties. For further details on third parties, see the “Third Parties” section below.

## 3 **Information We Collect.**

### A **Information You Provide.**

We collect information you provide to us, including information when you register an account, use the Service’s features such as to provide information about mass transit, update your profile, sign-up for our newsletters, or contact support. The categories of information we collect include:

- **Identifiers**, including your name, email address, postal address, and phone number.
- **Account credentials**, including your username, password, password hints, and other information for authentication or account access.
- **User-generated content**, including content within any messages you send to us (such as feedback, questions, or survey responses) or publicly post on the Service, such as condition reports about mass transit locations, which may be associated with your username. We also

collect information about your favorite or most recently visited mass transit locations, and your votes about other users' public posts that you find helpful.

Please do not provide any information that we do not request.

## **B Information from Your Browser or Device.**

In addition, when you use the Service (including when you visit our websites or apps, open or click on our emails, or interact with our advertisements), we and third parties we work with automatically collect information from your browser or device. The categories of information we automatically collect include:

- **Device identifiers**, including your device's IP address and Ad Id.
- **Device information**, including your device's operating software and browser (e.g., type, version, and configuration), internet service provider, and regional and language settings.
- **Internet activity**, including information about your browsing history and interactions, such as the features you use, pages you visit, content you view, time of day you browse, and referring and exiting pages.
- **Non-precise location data**, such as location derived from an IP address or data that indicates a city or postal code level.
- **Precise location data**, such as latitude / longitude, with your consent.

The types of tracking technologies we use to automatically collect this information include:

- **Cookies**, which are small data files stored on your browser that save data about your visit. Cookies often include a unique identifier (e.g., cookie #123). We use two types of cookies: session cookies and persistent cookies. Session cookies make it easier for you to navigate our website and expire when you close your browser. Persistent cookies help with personalizing your experience, remembering your preferences, and supporting security features. Additionally, persistent cookies allow us to bring you advertising. Persistent cookies may remain on your device for extended periods of time, and expire on a set expiration date or when they are deleted manually.
- **Pixels** (also known as web beacons), which is code embedded in a service that sends information about your use to a server. Pixels provide similar functionality to cookies. There are various types of pixels, including image pixels (which are small graphic images) and JavaScript pixels (which contains JavaScript code). When you access a service that contains a pixel, the pixel may permit us or a third party to drop or read cookies on your browser, or collect other information about your visit.
- **Device fingerprinting**, which is the process of analyzing and combining sets of data elements from your device's browser, such as JavaScript objects and installed fonts, to create a "fingerprint" of your device and uniquely identify your browser and device.

- **App technologies**, which are technologies included in our apps that are not browser-based like cookies and cannot be controlled by browser settings. These technologies provide similar functionality to cookies. For example, our apps may include Software Development Kits (SDKs), which is code provided by third parties, such as Facebook and Google Maps, that allows us to track our conversions, bring you advertising, and provide you with additional functionality.
- **Precise location technologies**, which are technologies used to collect your precise location data. For example, GPS, WiFi, and Bluetooth may be used to collect precise location data when you consent to precise location tracking through our apps. Precise location data may be used for purposes such as verifying your device’s location and delivering or restricting relevant content and advertising based on that location.

For further details on how we use tracking technologies for analytics and advertising, and your rights and choices regarding them, see the “Analytics and Advertising” and “Your Rights and Choices” sections below.

#### C **Information from Other Sources.**

We also collect information from other sources. The categories of sources from which we collect information include:

- **Social media platforms** with which you interact.
- **Third Parties** that provide services to us, including analytics, advertising, and fraud prevention providers.
- **Publicly-available sources**, including data in the public domain.

#### D **Information We Create or Generate.**

We infer new information from other data we collect, including using automated means to generate information about your likely preferences or other characteristics.

### 4 **Use of Information.**

We collect and use information in accordance with the practices described in this Privacy Policy. Our purposes for collecting and using information include:

- Providing the Service to you.
- Preventing and addressing fraud, breach of policies or terms, or threats or harm.
- Understanding trends, usage, and activities, including through tracking technologies or surveys, to make business and marketing decisions.
- Communicating with you about updates, security alerts, changes to policies, and other transactional messages.

- Personalizing your experience to show you content we believe you will find interesting.
- Engaging in direct marketing, promotional communications, and non-personalized advertising.
- Engaging in personalized advertising, including Interest-based Advertising.
- Fulfilling any purpose at your direction.
- With notice to you and your consent.

Notwithstanding the above, we may use non-personal information for any purpose to the extent permitted by applicable law. For details on your rights and choices regarding how we use information about you, please see the “Your Rights and Choices” section below.

## 5 **Disclosure of Information.**

We disclose the information we collect in accordance with the practices described in this Privacy Policy. The categories of persons to whom we disclose information include:

- **Service Providers.** We use service providers to collect and process information on our behalf. Service providers assist us with services such as payment processing, data analytics, marketing and advertising, cloud hosting services, and technical support. To the extent required by law, we contractually prohibit our service providers from retaining, using, or disclosing information about you for any purpose other than performing the services for us, although we may permit them to use publicly available information (as that term is defined by applicable law) or information that does not identify you (including information that has been aggregated or de-identified as those terms are defined by applicable law) to the extent permitted by applicable law.
- **Analytics and Advertising.** We disclose information for analytics and advertising related purposes. The receiving persons may act as our service providers, or in certain contexts, independently decide how to process your information. For more information on advertising and analytics, see the “Analytics and Advertising” section below.
- **Affiliates.** We disclose information to our affiliates and related entities, including where they act as our service providers or for their own internal purposes.
- **Public Forums.** We disclose information you make public through the Service, such as information in your profile or that you post on public boards. Please think carefully before making information public as you are solely responsible for any information you make public. Once you have posted information, you may not be able to edit or delete such information, subject to additional rights set out in the “Your Rights and Choices” section below.
- **Merger or Acquisition.** We disclose information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale or any other type of acquisition or business combination of all or any portion of our assets, or transfer of all or a portion of our business to another business.

- **Security and Compelled Disclosure.** We disclose information to comply with the law or other legal process, and where required, in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We also disclose information to protect the rights, property, life, health, security and safety of us, the Service or anyone else.
- **Facilitating Requests.** We disclose information where you direct us to disclose the information.
- **Consent.** We disclose information with notice to you and your consent.

Notwithstanding the above, we may disclose non-personal information for any purpose to the extent permitted by applicable law. For details on your rights and choices regarding how we disclose information about you, please see the “Your Rights and Choices” section below.

## 6 **Third Parties.**

We offer parts of our Service through websites, platforms, and services operated or controlled by third parties. In addition, we integrate technologies operated or controlled by third parties into parts of our Service. Please note that when you interact with third parties, including when you leave our Service, those third parties may independently collect information about you and solicit information from you. The information collected and stored by third parties remains subject to their own policies and practices, including what information they disclose to us, your rights and choices on their services and devices, and whether they store information in the U.S. or elsewhere. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

Some examples of where you may interact with a third party include:

- **Links.** Our Service includes links that hyperlink to websites, platforms, and other services not operated or controlled by us. We may get a commission if you purchase a product after clicking on a link to an affiliate’s website.
- **Brand Pages and Messaging.** We may offer our content through social media. Any information you provide to us when you engage with our content (such as through our brand page or via a messenger) is treated in accordance with this Privacy Policy. Also, if you publicly reference our Service on social media (e.g., by using a hashtag associated with Company in a tweet or post), we may use your reference on or in connection with our Service.

## 7 **Analytics and Advertising.**

We may use analytics services, such as Google Analytics, to help us understand how users access and use the Service. In addition, we work with agencies, advertisers, ad networks, and other technology services to place ads about our products and services on other websites and services. For example, we may place ads through Google and Facebook that you may view on their platforms as well as on other websites and services.

As part of this process, we may incorporate tracking technologies into our own Service (including our website and emails) as well as into our ads displayed on other websites and services. Some of these tracking technologies may track your activities across time and services for purposes of associating the different devices you use, and delivering relevant ads and/or other content to you (“**Interest-based Advertising**”).

As indicated above, vendors and other parties may act as our service providers, or in certain contexts, independently decide how to process your information. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

For further details on the types of tracking technologies we use on the Service and your rights and choices regarding analytics and Interest-based Advertising, please see the “Information Collected Automatically” and “Your Rights and Choices” sections.

## **8 Your Rights and Choices.**

### **A. Region-Specific Rights.**

In addition to these rights and choices, you may have rights based on your region. For region-specific terms, please see the relevant sections at the end of this Privacy Policy.

### **B. Account Management.**

You may access, update, or delete certain information that you have provided to us through your account by visiting your account settings. Please note that we will retain information in accordance with our data retention practices.

### **C. Tracking Technology Management.**

- **Cookies.** Most browsers accept cookies by default. You can instruct your browser, by changing its settings, to decline or delete cookies. If you use multiple browsers on your device, you will need to instruct each browser separately. Your ability to limit cookies is subject to your browser settings and limitations.
- **Preference Signals.** Your browser or extension may allow you to automatically transmit **[Do Not Track](#)** and other tracking technology preference signals, and unless required by law, we do not respond to such signals. If you are a California resident, please visit the “California” section below for details on how to exercise your right to opt-out of sales or sharing through preference signals.
- **App Technologies.** You can stop all collection of information via an app by uninstalling the app. We will only receive access to your device’s Ad Id (known as an AAID) if you provide consent. You can reset your device’s Ad Id at any time through your device settings, which is designed to allow you to limit the use of information collected about your device.
- **Precise Location Technologies.** We will only receive access to your precise location data if you provide consent. You can stop all collection of precise location data through an app by uninstalling the app or withdrawing your consent through your device settings.

Please be aware that if you disable or remove tracking technologies some parts of the Service may not function correctly.

### **D. Analytics and Interest-Based Advertising Management.**

Google provides tools to allow you to opt out of the use of certain information collected by Google Analytics at <https://tools.google.com/dlpage/gaoptout> and by Google Analytics for Display Advertising or the Google Display Network at <https://www.google.com/settings/ads/onweb/>.

The companies we work with to provide you with Interest-based Advertising may be participants of the Digital Advertising Alliance (“DAA”) and/or the Network Advertising Initiative (“NAI”). To opt out of receiving Interest-based Advertising from the participating companies, please visit <https://www.aboutads.info/choices> and <https://www.networkadvertising.org/choices/> for website opt outs and <https://www.aboutads.info/appchoices> for mobile opt outs. Note that opting out through these links only means that the selected participants should no longer deliver Interest-based Advertising to you, but does not mean that the participants will not process your information for Interest-based Advertising purposes or that you will no longer receive Interest-based Advertising from other companies.

Please note that the above opt outs only apply to the specific browser or device from which you opt out. We are not responsible for the effectiveness of any opt outs offered by other entities.

#### **E. Communications.**

- **E-mails.** You can unsubscribe from receiving promotional emails by following the unsubscribe instructions at the bottom of the email, or emailing us at [userdata@transitarius.com](mailto:userdata@transitarius.com) with the word UNSUBSCRIBE in the subject field of the email. Please note that you cannot opt out of transactional messages.
- **Push Notifications.** If you have opted-in to receive push notification on your device, you can opt-out by adjusting your device settings or uninstalling our app.

Please note that your opt out is limited to the email address, device, and phone number used and will not affect subsequent subscriptions.

#### **9 Children.**

The Service is not directed toward children under 13 years old, and we do not knowingly collect personal information (as that term is defined by the U.S. Children’s Privacy Protection Act, or “COPPA”) from children. If you are a parent or guardian and believe we have collected personal information from children, please contact us at [userdata@transitarius.com](mailto:userdata@transitarius.com) with the word MINORS in the subject field of the email. We will delete the personal information in accordance with COPPA.

#### **10 Data Security.**

We implement and maintain reasonable administrative, physical, and technical security safeguards to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of information about you.

#### **11 Retention.**

We retain information for the length of time that is reasonably necessary for the purpose for which it was collected, and as necessary to comply with our legal obligations, resolve disputes, prevent fraud, and enforce our agreements.

## **12 International Transfer.**

We are based in the U.S. If you are located outside the U.S., please be aware that your information may be transferred to and processed in the U.S. or another country where we operate. Where required by applicable law, we will provide appropriate safeguards for data transfers, such as through use of standard contractual clauses.

## **13 Changes to this Privacy Policy.**

We reserve the right to revise and reissue this Privacy Policy at any time. Any changes will be effective immediately upon posting of the revised Privacy Policy. Your continued use of our Service indicates your consent to the Privacy Policy then posted. If the changes are material, we may provide you additional notice to your email address.

## **14 Contact Us.**

If you have any questions, or have trouble accessing this Privacy Policy, please contact us:

By email:

[userdata@transitarius.com](mailto:userdata@transitarius.com)

By mail:

Parthenon Technologies, Inc.  
P. O. Box 1672  
Morehead City, NC 28557

By toll-free phone:

888-343-0136

## **15 California.**

These additional rights and disclosures apply only to California residents. Terms have the meaning ascribed to them in the California Consumer Protection Act as replaced by the California Privacy Rights Act (“**CPRA**”), unless otherwise stated.

### **A Notice at Collection.**

At or before the time of collection, you have a right to receive notice of our data practices. The “Information Collection” section above sets out the categories of personal information we have collected and the sources from which we have obtained personal information in the past 12 months.

We collect and use this personal information for the business and commercial purposes set out in the “Use of Information” section above. We disclose this personal information to the categories of persons set out in the “Disclosure of Information” section above. Please visit those sections for further details.



We do not sell your personal information as that term is traditionally understood. However, some of our disclosures of personal information may be considered a “sale” or “share” as those terms are defined under the CPRA. A “sale” is broadly defined under the CPRA to include a disclosure for something of value, and a “share” is broadly defined under the CPRA to include a disclosure for cross-context behavioral advertising. We collect, sell, or share the following categories of personal information for commercial purposes: identifiers, characteristics or demographics, commercial or transactions information, user-generated content, device identifiers, device information, internet activity, non-precise geolocation data, and inferences drawn from any of the above. The categories of third parties to whom we sell or share your personal information include, where applicable, vendors and other parties involved in cross-context behavioral advertising. For details on your rights regarding sales and shares, please see the “Right to Opt-Out” section below.

We do not knowingly sell or share the personal information of minors under 16 years old who are California residents.

### **B Sensitive Personal Information.**

Some of the personal information we collect may be considered sensitive personal information. For example, precise location data or account credentials. For further details on the sensitive personal information we collect (if any) and how we obtain this information, please review the “Information We Collect” section above.

We collect, use, and disclose such sensitive personal information for the permissible business purposes for sensitive personal information under the CPRA as well as for the following purposes: to facilitate targeted advertising. For details about your right to limit the use or disclosure of your sensitive personal information, please see the “Right to Limit Use and Disclosure of Sensitive Personal Information” section below.

We sell or share the following categories of sensitive personal information: precise geolocation information. The categories of third parties to whom we may sell or share your personal information include, where applicable, vendors and other parties involved in cross-context behavioral advertising. For details about your rights regarding sales and shares, please see the “Right to Opt-Out” section below.

### **C Retention.**

We retain each category of personal information, including sensitive personal information, for the length of time that is reasonably necessary for the purpose for which it was collected, and as necessary to comply with our legal obligations, resolve disputes, prevent fraud, and enforce our agreements.

### **D Rights to Know, Correct, and Delete.**

You have the right to request the following from us:

- The categories of personal information we have collected about you;
- The categories of sources from which the personal information was collected;
- The categories of personal information about you we disclosed for a business purpose or sold or shared;

- The categories of persons to whom the personal information was disclosed for a business purpose or sold or shared;
- The business or commercial purpose for collecting or selling or sharing the personal information; and
- The specific pieces of personal information we have collected about you.

In addition, you have the right to correct or delete the personal information we have collected from you.

To exercise any of these rights, please email us at [userdata@transitarius.com](mailto:userdata@transitarius.com) with the word DSAR in the subject field of the email. Please note these rights are subject to exceptions. If you have an account with us, we may require you to use the account to submit the request. In the request, please specify which right you are seeking to exercise and the scope of the request. We will confirm receipt of your request within 10 business days and respond to your request within 45 days. We may require specific information from you to help us verify your identity and process your request. If we are unable to verify your identity, we may deny your request.

#### **E Right to Opt-Out of Sales and Sharing.**

To the extent we “sell” or “share” your personal information as those terms are defined under the CPRA, you have the right to opt-out of the sale or sharing of your personal information, which you can exercise through this [Do Not Sell or Share My Personal Information](#) link or the link in the footer of our website. In addition, you may exercise this right by turning on a recognized opt-out preference signal, such as [Global Privacy Control](#), in your browser or extension.

Unless you are signed into your account, when you submit an opt-out, your opt-out will only apply to sales and shares of personal information through tracking technologies from the specific browser or device from which you submitted the opt-out because the connection between your browser identifiers and other personal information we have about you is not known to us. If you want the opt-out to also apply across devices you use to access the Service, make sure you are logged into your account when submitting the opt-out.

#### **F Right to Limit the Use of Sensitive Personal Information.**

To the extent we use or disclose your sensitive personal information for purposes other than those specified as permissible business purposes under the CPRA, you have the right to limit the use or disclosure of your sensitive personal information. You may exercise this right through this [Limit the Use of My Sensitive Personal Information](#) link or the link in the footer of our website. In addition, you may exercise this right in the Privacy settings of the application.

#### **G Authorized Agent.**

You can designate an authorized agent to submit requests on your behalf. Requests must be submitted through the designated methods listed above. Except for opt-out requests, we will require written proof of the agent’s permission to do so and may verify your identity directly.

#### **H Right to Non-Discrimination.**

You have the right not to receive discriminatory treatment by us for the exercise of any your rights.

## **I Shine the Light.**

Under California’s Shine the Light law, Customers who are residents of California may request (i) a list of the categories of personal information disclosed by us to third parties during the immediately preceding calendar year for those third parties’ own direct marketing purposes; and (ii) a list of the categories of third parties to whom we disclosed such information. To exercise a request, please write us at the email or postal address set out in “Contact Us” above and specify that you are making a “California Shine the Light Request.” We may require additional information from you to allow us to verify your identity and are only required to respond to requests once during any calendar year.

### **16 Nevada.**

We do not sell and will not sell your covered information (as those terms are defined by NRS 603A.340).

### **17 Virginia.**

These additional rights and disclosures apply only to Virginia residents. Terms have the meaning ascribed to them in the Virginia Consumer Data Protection Act (“**VCDPA**”).

You have the following rights under the VCDPA:

- To confirm whether or not we are processing your personal data
- To access your personal data
- To correct inaccuracies in your personal data
- To delete your personal data
- To obtain a copy of your personal data that you previously provided to us in a portable and readily usable format
- To opt out of the processing of personal data for purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you

To exercise the rights to (i) confirm whether we are processing your personal data, (ii) access your personal data, (iii) correct inaccuracies in your personal data, (iv) delete your personal data, or (v) obtain a copy of your personal data, please email us at [userdata@transitarius.com](mailto:userdata@transitarius.com) with the word DSAR in the subject field of the email and specify which right you are seeking to exercise. To exercise your right to opt out of the processing of personal data for purposes of targeted advertising and the sale of personal data, please use this [link](#). We will respond to your request within 45 days. If you have an account with us, we may require you to use the account to submit the request. We may require specific information from you to help us confirm your identity and process your request.

If we refuse to take action on a request, you may appeal our decision within a reasonable period time by contacting us at [userdata@transitarius.com](mailto:userdata@transitarius.com) with APPEAL in the subject field of the email and specifying you wish to appeal. Within 60 days of our receipt of your appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, you may submit a complaint to the Virginia Attorney General at <https://www.oag.state.va.us/consumercomplaintform>.