



# Privacy Policy

## Delvioo™ Driver App

**Valid for:** United States of America

**Effective Date:** January 1, 2026

**Last Updated:** January 1, 2026

**Version:** 1.0

**Governing Entity:** Cultioo Inc., a Delaware Corporation

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Cultioo Inc., a Delaware corporation, understands that privacy and the security of personal data are fundamental concerns for its independent contractor drivers. This Privacy Policy describes in detail Delvioo™'s data collection, usage, disclosure, and security practices in compliance with United States privacy laws, including the Delaware Personal Data Privacy Act (DPDPA), the Federal Trade Commission (FTC) regulations, and the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA).

Delvioo™ is committed to maintaining the trust of its drivers by prioritizing privacy, implementing comprehensive technical and organizational measures (TOMs) to secure driver data, and ensuring complete transparency regarding all data processing activities.

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## 1. Scope and Application

### 1.1 Scope

This Privacy Policy applies to all independent contractors (drivers) who use the Delvoo™ Driver Mobile App and associated services within the United States of America. Delvoo™ functions as the logistics and delivery execution layer of the Cultioo ecosystem, facilitating transportation of agricultural and commercial goods between sellers and buyers.

### 1.2 What Is the Delvoo™ Driver App?

The Delvoo™ Driver Portal is a standalone professional mobile environment for the transport sector embedded within the Cultioo Business App. It supports both independent operators and full fleet structures. Key capabilities include:



<b>Feature</b>	<b>Description</b>
<b>Transport Discovery</b>	Real-time geospatial map of open transport assignments – interactive pins at seller pickup locations, sortable by vehicle compatibility and contract value
<b>Bid Workflow</b>	Step-by-step route evaluation, vehicle compatibility check, capacity confirmation, and price submission – fixed total price or per km/mi rate
<b>Active Order Management</b>	Simultaneous management of multiple active deliveries with CullyAI™ automated route optimization
<b>End-to-End Delivery Cycles</b>	Dual QR-code verification at both seller (pickup) and buyer (delivery) facilities – two mirrored check-in / check-out cycles
<b>CullyAI™ In-Navigation Intelligence</b>	Proactive real-time discovery of compatible open orders while navigating – popup alerts with route, distance, fuel, and price data
<b>Fleet Group Management</b>	Fleet Admin / Member role system with consolidated earnings and invoice access
<b>CO<sub>2</sub> &amp; Sustainability</b>	Monthly CO <sub>2</sub> reporting and Sustainability Certificate generation
<b>Detention Billing</b>	Automated waiting time billing with geofenced arrival trigger and configurable hourly rates

**Note:** The Delvioo™ Driver Portal is mobile-only. Desktop access is not available for drivers.

### 1.3 Legal Framework

Delvioo™'s commitment to privacy is guided by:

- Delaware Personal Data Privacy Act (DPDPA) – Privacy law of the State of Delaware
- Federal Trade Commission (FTC) Act – Federal requirements for fair data practices



- California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA) – As best-practice standards for sensitive data
- Virginia Consumer Data Protection Act (VCDPA)
- Colorado Privacy Act (CPA)
- Connecticut Data Privacy Act (CTDPA)
- Other applicable state privacy laws

## 1.4 Driver Status

Delvioo™ drivers operate as **independent contractors with 1099 status** and are not employees of Cultioo Inc.

Although the DPDPA in Delaware may exclude individuals in an employment relationship from protection, Delvioo™ grants all drivers the comprehensive rights prescribed by the CPRA, regardless of their location or employment status.

## 1.5 Consent Through Use

By registering for or using the Delvioo™ Driver App, you provide explicit consent to the collection and processing of your data in accordance with this Privacy Policy.

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## 2. Controller and Contact Information

### **Responsible Company:**

Cultioo Inc.  
A Delaware Corporation  
8 The Green, Ste A  
Dover, DE 19901  
United States of America



**Contact:** [privacy@cultioo.com](mailto:privacy@cultioo.com)  
**Privacy Office:** [privacy@cultioo.com](mailto:privacy@cultioo.com)  
**Online Request Portal:** [www.cultioo.com](http://www.cultioo.com)

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## 3. Definitions

### 3.1 Personal Information (PI)

Information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, including but not limited to: names, email addresses, physical addresses, phone numbers, IP addresses, driver's license numbers, financial account information, tax identification numbers, and location data.

### 3.2 Sensitive Personal Information (SPI)

A subcategory of Personal Information requiring enhanced protection, including:

- Precise location data (GPS geolocation that can identify a person within 1,850 feet / approximately 564 meters)
- Financial account information and credentials
- Tax identification numbers (SSN, TIN)
- Driver's license numbers
- Other highly sensitive government identifiers

### 3.3 Sale

The selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information to another business or third party for monetary or other valuable consideration.

### 3.4 Sharing

The sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information to a third party for cross-context behavioral advertising.

### 3.5 Service Provider

A business that processes personal information on behalf of Delvioo™ and is contractually bound to use the data exclusively for agreed-upon purposes.

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## 4. Consent and Data Basis

### 4.1 Basis for Data Processing

The processing of your data is based on two main pillars:

1. **Contractual Necessity:** Processing is necessary to provide the logistics service, facilitate orders, and enable payouts.
2. **Explicit Consent:** Particularly for sensitive data (precise location data, financial information), you provide your explicit, revocable consent.

### 4.2 Consent Mechanism

Registration on the Delvioo™ platform, as well as subsequent updates to settings and use of services, constitute explicit consent to the processing of personal information in accordance with this policy.

This form of consent is:

- Electronically documented



- Clear and unambiguous
- Revocable at any time

### 4.3 Right to Withdraw

You have the right to withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing conducted prior to withdrawal.

**IMPORTANT NOTICE:** Since the processing of certain data (particularly precise location data) is strictly necessary for contract performance, withdrawal of this consent may result in Delvioo™'s inability to provide the logistics service.

### 4.4 Data Storage Upon Registration

All data shared or modified in the app is stored in a secure database by Delvioo™.

#### **Password Security:**

- Passwords are hashed (irreversibly encrypted) before storage in the database
- Delvioo™ employees have no access to your original passwords
- Industry-standard cryptographic hash functions are used (e.g., bcrypt, Argon2)

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## 5. Categories of Information Collected and Processing Purposes

In accordance with CCPA/CPRA and DPDPA, Delvioo™ discloses the following categories of personal information collected in the last 12 months:



## 5.1 Detailed Overview of Data Categories

CCPA/CPRA Category	Examples of Data Collected	Source	Primary Purpose	Disclosed to Third Parties
<b>A: Identifiers</b>	Full name, email address, physical address, phone number, driver's license number, driver's device ID, IP address	Driver registration, transactional input, device address	Account management, identification, security, order processing	Yes (service providers, buyers during active orders)
<b>B: Personal Records Information</b>	Name, address, phone number, driver's license information	Driver input, verification process	Order processing, verification, emergency contact	Yes (service providers, buyers/sellers in emergencies)
<b>D: Commercial Information</b>	Order history, transaction records, payout history, earnings and performance statistics	Transactions, driver activity	Order processing, billing, payout, internal analysis	Yes (payment processors)
<b>F: Internet / Network Activity</b>	Interaction with app, session duration, settings changes, device/OS details	Device, app usage	Debugging, quality assurance, service improvement, security monitoring	Yes (analytics providers/service providers)



CCPA/CPRA Category	Examples of Data Collected	Source	Primary Purpose	Disclosed to Third Parties
<b>G: Geolocation Data</b>	Precise GPS coordinates, real-time truck location	Device (with explicit consent)	Order fulfillment, tracking, route optimization, status display	Yes (buyers, Delvoo™ dispatch team during active orders)
<b>K: Sensitive Personal Information (SPI)</b>	Precise location, financial account information, tax identification numbers (SSN, TIN), driver's license number	Device, driver input, verification process	Service provision, payment processing, tax compliance, identity verification	Yes (Stripe for payments/taxes, buyers for tracking)

## 5.2 Detailed Description of Data Categories

### A. Identifiers

#### Data Collected:

- Full name (first and last name)
- Email address
- Physical address (residential address)
- Phone number
- Driver's license number
- Device ID and unique identifiers
- IP address

#### Processing Purposes:

- Creation and management of your driver account
- Authentication and access control



- Identification during order handover and gate verification
- Communication with you
- Fraud prevention and security

**Sources:** Direct input by driver upon registration; automatic collection by device.

## B. Commercial Information

### **Data Collected:**

- Order history and delivery details
- Transaction records
- Payout history
- Earnings and performance statistics
- Distance tracking data (Today / This Week / This Month)
- Fuel efficiency and CO<sub>2</sub> emission data per order

### **Processing Purposes:**

- Processing orders
- Calculating and disbursing compensation (95% of agreed transport price per completed delivery)
- Performance analysis
- Sustainability Certificate generation
- Internal analysis to improve the platform

**Sources:** Driver activity within the app, order processing.

## C. Internet and Network Activity

### **Data Collected:**

- Interaction data with the app
- Pages and features visited
- Click and navigation behavior
- Session duration
- Device type, operating system



- App version

**Processing Purposes:**

- Ensuring app functionality
- Identifying and fixing errors (debugging)
- Analyzing usage to improve user experience
- Security monitoring

**Sources:** Automatic collection during app usage.

D. Precise Geolocation Data (Sensitive Personal Information)

**Data Collected:** GPS coordinates of the truck, precise geographic location in real-time

**Processing Purposes:**

- Strictly necessary for contract performance: real-time delivery tracking, route optimization, status display for buyers
- Transparent communication of delivery status to buyers and seller
- Emergency management
- Geofenced Arrival Trigger: activating the Arrived button and initiating the detention billing timer upon entry within 5 km/mi of the declared delivery address
- CullyAI™ proximity-based discovery of nearby open orders during active navigation

**IMPORTANT NOTICE:** This data is classified as Sensitive Personal Information (SPI) and requires your explicit consent. However, processing is strictly necessary to fulfill the logistics order.

**Temporal Limitation:** Real-time tracking is exclusively active during active orders. No tracking outside working hours.

**Sources:** Driver's device (with explicit device permission and consent).



## E. Financial Account Information and Tax Data (Sensitive Personal Information)

### **Data Collected:**

- Complete bank account numbers
- Credit card information
- Tax identification numbers (SSN for U.S. citizens, TIN for businesses)
- W-9 forms (for U.S. persons)
- W-8 forms (for foreign contractors)

### **Processing Purposes:**

- Disbursement of compensation
- Compliance with U.S. tax reporting laws (IRS regulations)
- Fraud prevention and anti-money laundering (AML)

**Special Note:** This data is processed and stored exclusively by Stripe Inc. (see Section 7).

**Sources:** Driver input during the 10-stage registration process (Stage 07 – Stripe Connect KYC workflow).

## F. Vehicle and Fleet Data

### **Data Collected:**

- Vehicle Make, Model, Production Year, VIN (Vehicle Identification Number)
- License plate (front and back photographs – international format support: US, Mexico, Canada, EU, Russia)
- Vehicle Registration and Insurance Proof
- Wagon / Trailer Type (Grain Hoppers, Oil Bunkers, Refrigerated Wagons, etc.)
- Multi-section compartment configuration
- Cargo and payload capacity
- Fuel economy (MPG or L/100km)
- Internal cargo dimensions (Length, Width, Height)



- Cold chain temperature range (Min/Max °F or °C – for refrigerated vehicles)

**Processing Purposes:**

- Vehicle compatibility checks against Transport Matrix requirements for each order
- Automatic blocking of incompatible or out-of-range assignments
- Fuel efficiency and profitability analysis
- CO<sub>2</sub> emission calculation and Sustainability Certificate generation
- LTL (Less Than Truckload) multi-section optimization

**Sources:** Driver input in Vehicle Management settings; photograph capture.

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## 6. Data Storage and Data Security

### 6.1 Highest Priority

**Privacy and Security Are Our Priority.**

Delvoo™ treats data security as a core business function and implements comprehensive technical and organizational measures (TOMs) to protect driver data from unauthorized access, use, or disclosure.

### 6.2 Technical and Organizational Measures (TOMs)

#### a) Cryptography and Password Security

- **Irreversible Hashing:** All driver passwords are immediately encrypted upon creation using an irreversible hashing process
- **No Plain Text Storage:** Passwords are never stored in plain text
- **No Employee Access:** Even Delvoo™ employees and administrators have no access to your original passwords

- **Industry Standard:** Use of cryptographic standards (e.g., bcrypt, Argon2)

#### b) Encrypted Data Transmission

- **Transport Layer Security (TLS):** All data transmissions between your app and Delvoo™ servers occur over encrypted HTTPS/TLS connections
- **End-to-End Protection:** Protection against eavesdropping and man-in-the-middle attacks
- **At-Rest Encryption:** Sensitive Personal Information (SPI), including geolocation data and financial data, is stored encrypted

#### c) Access Control

- **Strict Internal Access Policies:** Only authorized employees with legitimate business needs have access to personal information (need-to-know basis)
- **Driver-Exclusive Modifications:** Personal data and payment settings can only be changed by the authenticated driver via the secure app
- **Multi-Factor Authentication:** Critical operations (account deletion, password change, payment changes) require additional confirmation

#### d) Data Loss Prevention (DLP)

- Implementation of systems to monitor and prevent unauthorized transmission or storage of sensitive data
- Automatic detection and blocking of data leaks

#### e) Infrastructure Security

- **Secure Server Environment:** Use of professional, certified data centers
- **Regular Security Audits:** Conducting penetration tests and security reviews
- **Incident Response Plan:** Established procedures for handling security incidents
- **Regular Backups:** Secure data backups to ensure data integrity

#### f) Employee Training

- Regular training of all employees on privacy and data security

- Commitment to confidentiality

### 6.3 Secure and Irreversible Deletion

- **Final Data Deletion:** When you delete your account, all associated data is finally and irrevocably removed from the database (subject to legal retention obligations)
- **No Recovery Possible:** Deleted data cannot be restored
- **Secure Deletion Protocols:** Use of secure deletion methods that prevent recovery

### 6.4 Navigation Privacy

Drivers may delete all historical navigation data directly from the account settings at any time — clearing sensitive pickup locations, route history, and destination data from the device.

### 6.5 No Disclosure to Third Parties for Marketing

Your data is fundamentally not disclosed to third parties for advertising or marketing purposes.

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## 7. Payment Processing, Bank Data, and Tax Compliance

### 7.1 Exclusive Use of Stripe Inc.

Cultioo Inc. partners with Stripe Inc., a leading PCI-DSS certified payment service provider. All payment processing and storage of financial data is conducted exclusively through Stripe.

### 7.2 Security of Your Financial and Tax Data

#### **Secure Storage:**



- All provided bank accounts and credit card data are stored exclusively securely and encrypted by Stripe Inc.
- Delvoo™ never receives or stores your complete bank account numbers or credit card data
- **PCI-DSS Compliance:** Stripe meets the highest security standards of the payment card industry (PCI-DSS Level 1)

### **W-9/W-8 Tax Compliance:**

- W-9 data (for U.S. citizens and residents) and W-8 data (for foreign contractors) are stored encrypted by Stripe
- Collection of this data is a legal obligation to comply with U.S. tax reporting laws (IRS regulations)
- This processing cannot be circumvented

## 7.3 Driver Earnings and Payout Structure

### **Fee Structure:**

- Delvoo™ deducts a **5% service fee** from every completed assignment payout – retained by Cultioo™ as the platform commission
- The driver receives **95% of the agreed transport price** for every completed delivery – credited automatically upon buyer-confirmed order completion

### **Payout Schedule Options:**

<b>Schedule</b>	<b>Description</b>
<b>Standard Settlement</b>	Accumulated earnings transferred on the first day of every month – predictable monthly revenue stream
<b>Instant Payout</b>	On-demand immediate payout for a nominal processing fee – covers urgent operational costs such as fuel or maintenance

**Bank Linking:** One primary bank account per driver – single-source logic simplifies the audit trail and secures the fund destination.

**Fleet Group Payouts:** Admins have exclusive visibility into total earnings for all group members and can download all official fleet invoices.

## 7.4 Payout Trigger — Proof of Delivery

Payment is only released for payout when:

- The driver has completed the full delivery cycle at the buyer facility, AND
- The buyer-side operator has executed the final departure QR scan authorizing departure

### **Processed Data at Payout Trigger:**

- Location and timestamp of successful final QR scan
- QR code / Security Code validation
- Digital signatures (buyer-side operator and driver)
- Delivery confirmation status

**Legal Basis:** Contract performance (Contractual Necessity). Processing of Proof of Delivery data is a necessary prerequisite for financial settlement.

## 7.5 Stripe as Independent Controller

- **Independent Responsibility:** Stripe Inc. acts as an independent data controller for the personal information it processes
- **Separate Privacy Policy:** You are subject to Stripe's separate privacy policy and terms of service
- **Stripe Privacy Policy:** <https://stripe.com/privacy>

## 7.6 Fraud Prevention and Anti-Money Laundering

Stripe uses the transmitted personal information for:

- Fraud detection and loss prevention
- Anti-money laundering (AML) compliance
- Identity verification (Know Your Customer — KYC)

This use serves the legitimate interests of the company and ensures the security of the payment system.

## 7.7 Tax Retention Obligations

Delvoo™ and Stripe are obligated to comply with specific retention periods for tax documents:

- W-9/W-8 forms: Minimum 7 years
- Financial and payout records: Minimum 4 years

These periods comply with the requirements of the Internal Revenue Service (IRS) and the Federal Acquisition Regulation (FAR).

## 7.8 Disclaimer

Delvoo™ assumes no responsibility or liability for the security or use of data processed by Stripe. Use of Stripe occurs as a third-party service.

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# 8. Data Disclosure and Emergency Scenarios

## 8.1 Principle of Non-Disclosure

Delvoo™ commits to not forwarding driver personal information to uninvolved third-party organizations, except in the following explicitly disclosed exceptions.

This serves to comply with the prohibition of unauthorized sale or disclosure of data without driver consent, as prescribed by DPDPA and CPRA.

## 8.2 Operational Disclosure (Standard Logistics)

To transparently process orders, certain minimal necessary information is operationally disclosed:



a) To the Buyer (Recipient)

<b>Data</b>	<b>Purpose</b>	<b>Temporal Limitation</b>
Driver's first and last name	Identification and delivery confirmation	Only during active orders
Real-time truck location (GPS)	Transparent delivery status communication	Exclusively during an active order

**Legal Basis:** Contract performance.

**Privacy Principle:** Disclosure is strictly limited to the duration of service to respect privacy outside working hours.

b) To the Seller (Pickup Facility)

<b>Data</b>	<b>Purpose</b>	<b>Temporal Limitation</b>
Driver's first and last name	Gate identification	Only during active orders
Real-time truck location (GPS)	ETA display to seller and on-site operator	From order acceptance until departure confirmation

The seller's live GPS display of the truck's position is continuously transmitted throughout the transit, enabling real-time tracking of the truck's movement from pickup to delivery.

c) To On-Site Operators (Cultioo Scanner App)

During active gate verification cycles, the following driver data is retrieved by on-site operators via QR scan:

<b>Data</b>	<b>Purpose</b>
Driver Full Name (from KYC record)	Verbal identity confirmation at the gate
Driver Profile Photo (from KYC record)	Visual cross-reference against physical driver present



<b>Data</b>	<b>Purpose</b>
License Plate (from order assignment)	Must match exactly – mismatch blocks check-in
Order ID	Reference for all documentation and dispute records
QR Code / Security Code	Dual-authentication mechanism for physical cargo access

This data is retrieved exclusively during active gate verification and constitutes part of the chain of custody record.

#### d) Delvoo™ Dispatch Team

<b>Data</b>	<b>Purpose</b>	<b>Temporal Limitation</b>
Real-time location	Route optimization, emergency management	Only during active order time
Contact details	Emergency management	Only during active order time

**Legal Basis:** Legitimate interest / Vital interest.

### 8.3 Obligation to Disclose in Emergency Scenarios

In critical and unforeseen situations, Delvoo™ is obligated to disclose driver data (first name, last name, phone number, email) to the buyer and/or seller team.

#### **Emergency scenarios include:**

1. **Product picked up but not arrived:** Delivery was picked up from seller but has not arrived at destination; agreed delivery time exceeded
2. **Suspicious truck movement:** Buyer reports truck driving in wrong direction; truck stops for extended period without apparent reason; unusual route deviations



3. **Breakdown or unforeseen event:** Technical problems with vehicle; traffic accident; weather conditions or road closures critically affecting delivery time

**Legal Basis:**

- Vital Interest: Safety of driver and cargo
- Legitimate Interest: Loss prevention, ensuring contract fulfillment
- Contract Performance: Necessary communication for order processing

8.4 Legal Obligation (U.S. Standard)

Delvoo™ is obligated to disclose data to state or federal authorities when required by valid, formal legal process.

**Requesting Entities:** Law enforcement agencies, Courts, Regulatory agencies

**Legal Instruments:** Valid subpoena, Search warrant, Court order, Other legally mandated requests

**Scope of Disclosure:** Delvoo™ will only disclose data to the extent strictly necessary to comply with the legal obligation.

**Transparency Commitment:** Where legally permissible, Delvoo™ will inform the driver of such an order before data is disclosed.

8.5 Data Disclosure Overview

Recipient	Data Categories	Purpose	Legal Basis	Limitations
Stripe Inc.	Financial data, tax data (W-9/W-8)	Payout, tax compliance, fraud prevention	Contract performance / Legal obligation	Refer to Stripe Privacy Policy; encrypted storage



<b>Recipient</b>	<b>Data Categories</b>	<b>Purpose</b>	<b>Legal Basis</b>	<b>Limitations</b>
<b>Buyer (Delivery Recipient)</b>	First name, last name; real-time location	Identification, status transparency	Contract performance	Only during active order time
<b>Seller (Pickup Facility)</b>	First name, last name; real-time location	Gate identification, ETA display	Contract performance	Only during active order time
<b>On-Site Operators (Scanner App)</b>	KYC profile data, license plate, QR/Security Code	Gate verification, chain of custody	Contract performance	Only during active gate verification cycles
<b>Seller Team</b>	Contact details (emergencies only)	Emergency management	Vital interest / Legitimate interest	Only during critical incidents
<b>Delvioo™ Dispatch Team</b>	Real-time location, contact details	Route optimization, emergency management	Legitimate interest / Vital interest	Only during active order time
<b>U.S. Authorities</b>	All relevant data (per request)	Response to valid legal processes	Legal obligation (subpoena, court order)	Disclosure only when legally required

## 9. Location Data (Precise Geolocation)

### 9.1 Classification and Special Nature

Precise geolocation data is classified in leading U.S. states as **Sensitive Personal Information (SPI)**.



**Definition:** Precise geolocation identifies a person within 1,850 feet (approximately 564 meters) or more precisely.

The processing of this data is therefore subject to enhanced due diligence and special driver rights.

## 9.2 Strict Necessity for Contract Performance

Collection of precise truck location data is strictly necessary to fulfill the logistics order.

### **Use Purposes:**

- Real-time delivery tracking
- Route optimization
- Transparent status display for buyers and sellers
- Emergency management
- Geofenced Arrival Trigger: the Arrived button is exclusively activated within a 5 km/mi geofence radius of the declared delivery address – ensuring accurate timestamping for detention billing and preventing premature arrival declarations
- CullyAI™ proximity-based discovery: continuously scanning for compatible open orders within the driver's pre-configured search radius during active navigation

### **Without this data, Delvoo™ cannot:**

- Process orders transparently
- Provide delivery status display
- Activate the Arrived geofenced trigger
- Intervene in emergencies
- Enable CullyAI™ proactive order matching

## 9.3 Explicit Consent and Limitations

**Consent:** The driver provides explicit, revocable consent to the collection of precise location data.



This consent is granted:

- During registration (device permissions)
- At the start of each order

**Purpose Limitation and Data Minimization:**

- Data is used only for order fulfillment, route optimization, transparent status display, detention billing, and CullyAI™ proximity features
- Location tracking is exclusively limited to the duration of an active order
- No tracking outside working hours

## 9.4 Driver Rights Regarding Location Data

### a) Right to Limit Use (Right to Limit Use of SPI)

Under CPRA, you have the right to limit the use of your precise location data to purposes that are strictly necessary to provide the service.

**Practical Implementation:**

- Location data is used exclusively for order fulfillment, route optimization, status display, and detention billing
- Delvoo™ does not use your location data for advertising purposes, profiling, or other non-operational purposes

### b) Withdrawal of Consent

You can withdraw your consent to location collection at any time via device settings.

**Consequence:** Should you limit or withdraw the use of precise geolocation, Delvoo™ cannot transparently process the logistics order and is entitled to discontinue the service.



## 9.5 Control Over Location Access

You have complete control over location access at all times:

- **Device Settings:** You can control the Delvoo™ App's access to your location data via your mobile device settings (iOS or Android)
- **Options:**
  - Completely disable location access
  - Allow location access only while using the app
  - Disable precise location (approximate location only)

**Note:** Disabling location services makes execution of delivery orders impossible.

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## 10. Payout Rules and Proof of Delivery

### 10.1 Purpose of Data Collection

Collection and processing of data related to delivery confirmation serves contract processing and authorization of compensation.

### 10.2 Delivery Execution – Dual QR Verification Cycles

All Delvoo™ deliveries pass through two mirrored verification cycles. The following data is generated and processed at each cycle:

#### **Cycle 1 – Pickup (Seller Facility)**

<b>Event</b>	<b>Data Generated</b>
<b>Check-In</b>	Operator scans driver QR Code – cross-referenced against Security Code. Entry authorized, detention timer stops, driver receives Gate Number, Weighing Instructions, and Loading Position. Timestamp permanently recorded.



**Event**

**Data Generated**

Operator conducts second QR scan to authorize departure. Seal number, batch data, gross weight, dispatch photographs, and compliance documents transmitted to driver's app. Order status advances to In Transit. Departure timestamp recorded.

**Cycle 2 – Delivery (Buyer Facility)**

**Event**

**Data Generated**

Buyer-side operator scans QR Code, cross-references Security Code, confirms seal integrity. Entry authorized, unloading instructions transmitted to driver. Detention timer stops. Timestamp permanently recorded.

Following unloading, operator executes final QR scan for departure authorization. Order status advances to Completed. Seller payment released from escrow. Driver earnings credited. Departure timestamp permanently recorded.

**10.3 Payout Trigger (Proof of Delivery)**

Payment is only released for payout when:

- The driver has brought the product to the final destination, AND
- The buyer-side operator has executed the final departure QR scan and both parties have signed digitally

**Processed Data:**

- Location and timestamp of successful final QR scan
- QR code / Security Code validation
- Digital signatures (buyer-side operator and driver)
- Delivery confirmation status

**Legal Basis:** Contract performance (Contractual Necessity).



## 10.4 Transfer and Processing Time

**Release for Transfer:** Payment is released for transfer immediately after successful validation and is ready for payout.

**Dependence on External Factors:** Actual crediting to your account depends on Stripe processing times, your bank's processing times, and your chosen payout schedule.

**Typical Processing Time:** 1–3 business days after release.

## 10.5 Access to Payout Accounts

Only the driver has sole access to managing payout accounts in the app.

### **Management Options:**

- Adding bank accounts
- Changing payout method (Standard Monthly / Instant On-Demand)
- Viewing payout history
- Managing tax information

**Security Measure:** All changes to payment settings require password confirmation.

## 10.6 Multi-Order Management and CullyAI™ Route Optimization

When a driver manages multiple simultaneous active orders, CullyAI™ automatically optimizes the combined route across all active assignments – minimizing fuel consumption and maximizing revenue-per-kilometer. Additional assignments can be appended to an existing active order mid-transit; each appended order triggers a recalculation of the combined route and ETA updates to all customers.

Each active order maintains its own independent QR verification cycle and payout record. Navigation Lock Protocol: once navigation has been

initiated for an open order, that order cannot be re-selected or reassigned, ensuring logistical integrity.

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## 11. Your Privacy Rights

Depending on your state of residence, independent contractors in the U.S. have specific legal rights regarding their personal information. Delvoo™ is committed to facilitating the exercise of these rights through transparent and accessible mechanisms.

### 11.1 Applicable Laws

The following rights apply particularly to residents of:

- **Delaware:** DPDPA
- **California:** CCPA/CPRA
- **Virginia:** VCDPA
- **Colorado:** CPA
- **Connecticut:** CTDPA
- **Utah:** UCPA

Delvoo™ grants these rights to all drivers, regardless of state of residence, to ensure a uniformly high privacy standard.

### 11.2 Right to Know / Right to Access

You have the right to request from Delvoo™ information about:

- Which categories of personal information were collected about you
- From which sources the personal information originated
- For which business or commercial purposes the data was collected or disclosed
- To which categories of third parties the personal information was disclosed
- The specific personal information that Delvoo™ has collected about you



**Time Period:** The disclosure relates to the preceding 12 months.

**Frequency:** You can exercise this right up to twice within 12 months free of charge.

### 11.3 Right to Delete

You have the right to request deletion of your personal information that Delvioo™ has collected about you.

**Self-Service Deletion:**

1. Navigate to account settings
2. Select "Delete Account"
3. Confirm by entering your password

After confirmation, all data associated with your account is finally and irrevocably removed from the database. Data recovery is not possible.

**Exceptions to Right to Delete:** Delvioo™ may deny deletion if data retention is necessary for:

- Completing the transaction for which the data was collected
- Detecting security incidents, protecting against fraudulent or illegal activities
- Debugging to identify and fix errors
- Complying with legal obligations (e.g., tax retention periods of 7 years)
- Internal uses reasonably aligned with expectations
- Asserting or defending legal claims

### 11.4 Right to Correct

You have the right to request correction of inaccurate personal information that Delvioo™ has stored about you.

**Self-Service Correction:**

- Navigate to account settings



- Modify the desired information
- Save changes

**Correctable Data:** Name, Email address, Phone number, Address, Profile picture.

**Verification Requirement:** When requesting a correction, you must provide specific evidence or documents demonstrating the inaccuracy. The burden of proof lies with the driver. The request must specify the desired changes in detail.

## 11.5 Right to Limit Use of Sensitive Personal Information

You have the right to direct Delvoo™ to limit the use of your sensitive personal information (SPI) to what is necessary to provide the requested services.

### **Delvoo™'s SPI Practices:**

#### **a) Precise Location Data:**

- Location data is used exclusively for order fulfillment, route optimization, status display, geofenced arrival detection, and CullyAI™ proximity features
- No use for advertising purposes or profiling
- Control: You can restrict or revoke location access at any time via your device settings

#### **b) Financial Account Information:**

- Delvoo™ does not store complete financial data
- Complete financial data is managed exclusively by Stripe

#### **c) Tax Data (SSN, TIN):**

- Used exclusively to fulfill legal obligations (IRS compliance)
- Stored encrypted by Stripe



A clearly visible link "Limit the Use of My Sensitive Personal Information" is available in app settings.

**IMPORTANT NOTICE:** Since precise geolocation is strictly necessary for contract performance, limiting this use would make service provision impossible.

## 11.6 Right to Opt-Out of Sale or Sharing

Delvioo™ does not currently sell or share personal information under CCPA/CPRA. Therefore, an opt-out is not currently required.

**Future Commitment:** Should Delvioo™ introduce practices in the future that constitute sale or sharing:

- A clearly visible link "Do Not Sell or Share My Personal Information" will be provided
- You can opt-out at any time without affecting service quality

**Universal Opt-Out Mechanisms (UOOMs):** Delvioo™ commits to respecting Universal Opt-Out Mechanisms such as Global Privacy Control (GPC).

## 11.7 Right to Data Portability

You have the right to receive the personal information concerning you in a structured, commonly used, and machine-readable format (e.g., JSON, CSV). Contact us using the contact details in Section 16 to request a copy of your data.

## 11.8 Right to Non-Discrimination

Delvioo™ expressly commits: **You will NOT be discriminated against for exercising any of your privacy rights.**

This specifically means:

- Service will not be denied to you
- You will not be offered different prices or compensation
- You will not be provided a lower quality of service
- You will not be treated differently

**Exception:** Delvioo™ may offer you different terms if that difference is reasonably related to the value your data provides to Delvioo™.

## 11.9 Exercising Your Rights

**Submitting a Request:** You can exercise your privacy rights through the following channels:

- **Online Request Portal:**  
[https://cultioo.com/en/en\\_cultioo\\_business\\_app\\_info#privacy](https://cultioo.com/en/en_cultioo_business_app_info#privacy)
- **Email:** [privacy@cultioo.com](mailto:privacy@cultioo.com)
- **Mailing Address:** Cultioo Inc., Attn: Privacy Rights Department, 8 The Green, Ste A, Dover 19901, United States

**Verification Process:** To protect the security of your data, Delvioo™ must verify your identity:

1. We match the information you provide with data stored in our records
2. For sensitive requests (e.g., deletion, access to specific data), additional verification steps may be required
3. **Required Information:** You must provide at least your full name, address, date of birth, and driver's license number
4. You can authorize a representative to submit a request on your behalf (written authorization required)

**Response Time:** Delvioo™ will process and respond to your request within **45 days** of receipt. In complex cases, this period may be extended by an additional 45 days; you will be informed.

**Free of Charge:** Exercising your privacy rights is free of charge.



## 12. Data Retention Policy

Delvoo™ stores personal information only as long as necessary to fulfill processing purposes or comply with legal retention requirements.

### 12.1 Criteria for Retention Period

The duration of data storage is determined by:

- **Contractual Necessity:** The time period required to maintain the business relationship and provide and settle agreed-upon services
- **Legal Statutes of Limitations:** Time periods during which Delvoo™ must be able to defend or assert legal claims
- **Regulatory Obligations:** Specific requirements from U.S. federal agencies (e.g., IRS for tax documents) or states for logistics and financial records

### 12.2 Specific Retention Periods

<b>Data Category</b>	<b>Retention Period</b>
<b>Tax data</b> (W-9/W-8)	7 years
<b>Financial and payout records</b>	4 years
<b>Invoices, bills of lading</b>	4 years
<b>Order and delivery data</b>	4 years
<b>Proof of Delivery records</b>	4 years
<b>Geolocation history</b>	90–180 days after order completion
<b>Identifiers</b> (name, email, address)	Until account deletion by driver
<b>Communication data</b>	12–24 months
<b>Logs, IP addresses, device IDs</b>	12–24 months

### 12.3 Special Treatment of Geolocation Data

Precise Location Data is stored only as long as necessary (90 to 180 days) after order completion to enable billing disputes or fraud prevention. After

this period expires, raw data is either securely deleted or anonymized so that it can no longer be associated with the driver.

## 12.4 Data Integrity and Secure Disposal

**Audit Trail:** When archiving and transferring data, Delvoo™ must maintain an audit trail to ensure the integrity, reliability, and security of original data.

**Secure Disposal:** After the retention period expires, data is disposed of securely and irrecoverably:

- **Electronic media:** Irrecoverable deletion or overwriting to ensure no data can be recovered
  - **Physical documents:** Burning or shredding
- 

## 13. Privacy of Minors

### 13.1 Children's Online Privacy Protection Act (COPPA)

The Delvoo™ Driver App is directed to an adult audience and is not designed or intended for persons under 18 years of age.

**Minimum Age for Drivers:**

- Drivers must be at least 18 years old
- Possession of a valid driver's license is required

**Commitment:** Delvoo™ does not knowingly collect personal information from persons under 18 years of age. If we become aware that we have inadvertently collected personal information from a person under 18, we will take steps to delete that information as soon as possible.



## 13.2 Parental Notice

Parents or legal guardians are encouraged to contact us if they believe a minor has provided Delvioo™ with personal information.

## 13.3 Age Verification

Upon registration, drivers must confirm they are at least 18 years old. Driver's license number is used for age verification as part of the 10-stage registration protocol (Stage 04–05).

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# 14. Do Not Track and Tracking Technologies

## 14.1 Use of Cookies and Tracking Technologies

The Delvioo™ Driver App may use cookies and similar tracking technologies to ensure functionality and improve user experience.

## 14.2 Types of Tracking Technologies

Type	Purpose	Legal Basis	Duration
<b>Essential Cookies</b>	Enable basic functions (e.g., login, session management)	Contract performance (necessary for service provision)	Until session end or up to 12 months
<b>Analytics Cookies</b>	Analyze usage to improve the app	Consent or legitimate interest	Up to 12 months
<b>Functional Cookies</b>	Remember user preferences and settings	Consent or legitimate interest	Up to 12 months

### 14.3 Cookie Control

You can adjust your cookie settings at any time via app settings or your device. Disabling certain cookies may limit app functionality.

### 14.4 Do Not Track (DNT) Signals

**Current Position:** Delvioo™ currently does not honor traditional Do Not Track (DNT) browser signals, as there is no uniform industry standard.

**Transparency:** We disclose that third-party tracking may occur through integrated service providers (e.g., analytics platforms).

### 14.5 Global Privacy Control (GPC)

**Commitment to Honor GPC:** In compliance with CCPA/CPRA and other state laws, Delvioo™ commits to recognizing and honoring the Global Privacy Control (GPC) signal as a valid opt-out request for:

- Sale of personal information
- Sharing for cross-context behavioral advertising

**Implementation:** When we detect a GPC signal from your browser or device, we will treat it as a request to opt-out on that browser/device.

### 14.6 Third-Party Trackers

The Delvioo™ Driver App may integrate third-party services that use their own tracking technologies:

**Examples:**

- Google Analytics (analytics)
- Firebase (crash reporting, analytics)
- Stripe (payment processing)



**Control:** These third parties have their own privacy policies. You can manage third-party tracking through device privacy settings, browser settings, and third-party opt-out tools.

## 14.7 Advertising and Marketing

**Current Status:** Delvioo™ does not currently display third-party advertising within the app.

**Future Disclosure:** If third-party advertising is introduced, you will be informed and appropriate opt-out mechanisms will be provided.

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## 15. Changes to This Privacy Policy

Delvioo™ reserves the right to update this Privacy Policy from time to time to reflect changes in legislation, business processes, or best practices in privacy.

### 15.1 Notification of Changes

Material changes to this Privacy Policy will be communicated clearly and conspicuously through:

- In-app notification
- Email to your registered email address
- Prominent notice on our website

### 15.2 Effective Date

The current version of this Privacy Policy is effective as of **January 1, 2026**.



### 15.3 Review Recommendation

We recommend that you periodically review this Privacy Policy to stay informed about how we protect your information.

### 15.4 Continued Use

Your continued use of the Delvioo™ Driver App after changes to this Privacy Policy constitutes acceptance of the updated terms.

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## 16. Contact Information

For questions, concerns, or to exercise your rights regarding your personal information, you can contact us through the following channels:

### 16.1 General Inquiries

Cultioo Inc.  
A Delaware Corporation  
8 The Green, Ste A  
Dover, DE 19901  
United States of America

**Email:** [support@cultioo.com](mailto:support@cultioo.com)

### 16.2 Privacy-Specific Inquiries

Privacy Department  
**Email:** [privacy@cultioo.com](mailto:privacy@cultioo.com)

### 16.3 Online Request Portal

[https://cultioo.com/en/en\\_cultioo\\_business\\_app\\_info#privacy](https://cultioo.com/en/en_cultioo_business_app_info#privacy)



## 16.4 Mailing Address

Cultioo Inc.  
Attn: Privacy Rights / Legal & Compliance Department  
8 The Green, Ste A  
Dover, DE 19901  
United States of America

## 16.5 Response Time

<b>Request Type</b>	<b>Response Time</b>
<b>Privacy Rights Requests</b>	45 days (may be extended to 90 days for complex requests with notification)
<b>General Inquiries</b>	5–7 business days

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