

Privacy Policy

Our commitment to privacy

Descartes respects that you care how information about you is used and shared. Our commitment to safeguarding your right to privacy is one of the many reasons we are a trusted provider of logistics services. This commitment includes controls on the protection and use of personal information within our organization, its systems and our web site, www.descartes.com, as well as programs to educate employees to respect your privacy at all times.

What this policy describes

This Privacy Policy describes the commitments of Descartes and the subsidiaries named in this Privacy Policy (the "Descartes Systems Group") and the rights of our customers and visitors of our web sites regarding personal information. It is also intended to comply fully with the Personal Information Protection and Electronic Documents Act in Ontario, Canada as well as the European Union's General Data Protection Regulation.

What this policy covers

This Privacy Policy applies to the following The Descartes Systems Group Inc. and all of its Affiliates as listed below, collectively, defined in this policy as "Descartes".

In addition to this Privacy Policy, Descartes may also be subject to the requirements of applicable local legislation, tariffs and regulations and the orders of any court or other lawful authority. Any time you do business with Descartes, you are protected by the rights and safeguards contained in this Privacy Policy.

Employees and Agents. This Privacy Policy also governs the behaviour of our employees and agents acting on our behalf. All of our employees who have access to personal information receive training on using and protecting that information. All of our employees and agents are bound by confidentiality and other agreements requiring them to protect any personal information they may access as part of their job.

Third Parties. This Privacy Policy also governs the information provided to third parties who act on our behalf. Third parties are utilized by Descartes only under limited circumstances and are subject to restrictions and controls as detailed under this Privacy Policy.

What is personal information?

Personal information is information about an identifiable individual. Depending on local law, publicly available information — such as a public directory listing of your name, address, telephone number, email or other electronic address — may not be considered personal information.

Why we collect personal information?

At Descartes, we strive to gather information only as necessary to conduct business, for the following purposes:

- to establish and maintain responsible commercial relations with you and provide you with ongoing service;
- to understand your needs and/or qualify you for products & services;
- to recommend particular products & services to meet your needs;
- to develop, enhance, market or provide products and services;

- to manage and develop Descartes Systems Group's business and operations, including personnel and employment matters;
- to respond to your request for further information or follow-up contact;
- to meet legal and regulatory requirements.

Using personal information

We will identify the purposes for which the personal information is collected at or before the time that the personal information is gathered from you. Your personal information will not be used for any other purpose without your consent.

Gathering personal information

There are several ways that Descartes may gather personal information:

Information you give us: At Descartes' request or on your own, you may complete a form (electronic or other formats) that includes personal information. Examples of these forms include a registration form for an event, a feedback survey or a subscription to an electronic newsletter. Please note that electronic forms may not be encrypted.

Information that is collected automatically: Descartes may automatically collect certain personal information when you interact with our web sites in a web browser. For example, log files record basic/system information, and we may collect specific information using "cookies". There are tools available that will allow you to visit web sites anonymously; however, we take care to use cookies only for specific functions and without them, you may not be able to receive all of our services or to request specific information or feedback from us.

Sample automatic information includes: The Internet protocol (IP) address used to connect your computer to the Internet, login information, email addresses, passwords, computer and connection information such as browser type and version, operating system and platform, the full Uniform Resource Locators (URL) click stream to, through, and from one of our web sites, including date and time, or cookie number.

Email: For some requests from you or from direct or indirect communications from Descartes, we contact you through email. To ensure that we are providing appropriate service, we sometimes receive confirmation when you open an email.

Information from other sources: In your interactions with other service providers and web sites, you may authorize third parties to collect your personal information and share it with Descartes. In these situations, we update our records to improve our communications with you.

What are cookies and how are they used?

Cookies are unique identifiers or tokens of agreement from a web server that are saved in a small text file on your computer when you access a Descartes web site through a browser. We can use this information to track visits to web pages (which ones, how many times) or to personalize web page content.

Most major web sites use cookies and most browsers are set up to accept them. If you wish, you can reset your browser to refuse to accept cookies or to notify you when a cookie is being sent-see "Help" in your browser. You do not need cookies to visit our web sites. However, if you do not accept cookies, you may not be able to use some of the features on the web sites.

Sharing information to meet your needs

We may share information, including personal information, among Descartes Systems Group companies to help us to identify you, for communication or to provide you with relevant information, advice, solutions or services. If you notify us of incorrect or outdated information, we will update that information promptly.

While our general policy is not to provide personal information to any party outside of the Descartes Systems Group, there are certain limited circumstances, outlined below, in which it is necessary to do so. When we do

provide personal information to third parties, we provide only that information that is required in the circumstances.

Information provided to third parties is used only for the purpose stipulated and is subject to strict terms of confidentiality. Employees of these third-party companies to whom we may provide information must adhere to our privacy standards. All third parties are bound by confidentiality and other agreements requiring them to protect personal information. Where necessary, third parties may also be required to agree to agreements allowing you certain rights, such as those found in the EU Commission's model clauses for residents of the European Union.

Third parties include:

- **An agent acting on behalf of Descartes to perform services**, such as a company hired to perform installation or maintenance on our behalf.
- **Another network service or logistics solution provider** to offer to you efficient and effective logistics products and network services (e.g., if you are receiving a wireless network solution and various network service providers are required to provide the roaming service in different coverage areas).
- **Acquirers of all or substantially all of the assets of Descartes**, as part of the due diligence or conclusion process for such a transaction.
- **A collection agency**, for the express purpose of the collection of any of your past due bills.
- **Law enforcement agencies**, in emergencies, for internal security matters, or where required by court order or search warrant.
- **Emergency services**, in emergency situations.

Our commitment to privacy

We take all of the necessary precautions to ensure the safeguarding of your information, whether it is stored electronically or in paper format. In all cases, information is retained in secure facilities, protected from unauthorized access and kept only as long as is reasonably required. For example, our electronic files are backed up for redundancy, password protected and accessible only by authorized employees, on a need-to-know basis. Personal information is retained only as long as necessary for the fulfillment of the above-specified purposes.

You access some content via passwords and logins. To ensure that these areas and your personal information used in these areas remain secure, it is important that you protect yourself against other parties accessing your password and your computer. We encourage you to log off each time you complete a secure session and each time that you complete a session on a shared computer.

Can I access my personal or account information?

You may decide that you prefer us not to share your personal information within Descartes to promote products and services. If this is the case, you may advise us by visiting one of our web sites or sending an email to info@descartes.com.

Upon request by you, Descartes will inform you of the existence, use and disclosure of your personal information and will give you access to that information. You may challenge the accuracy and completeness of the information and to have it amended as appropriate. You may also ask that we delete your personal information from our system, subject to commercially reasonable limits on the timing of such deletions.

Contact us

If you have questions or concerns about your privacy, you can contact us at info@descartes.com. Our customer service representatives will assist you in resolving the situation.

Additional Terms and Amendment

Descartes' Terms of Use posted at www.descartes.com are incorporated into this Privacy Policy by this reference.

This Privacy Policy may be amended at the sole discretion of Descartes from time to time, and such amendments shall be effective upon their posting at www.descartes.com.

Descartes Subsidiaries

The subsidiaries of The Descartes Systems Group Inc. are: Descartes Systems (Canada) Inc., Descartes U.S. Holdings, Inc., Descartes Systems (USA) LLC, Descartes Insurance Services, Inc., MacroPoint LLC, Coöperatie Descartes Netherlands Holdings U.A., Descartes Systems Europe BV, Descartes Systems UK Limited, Descartes Systems Group AB, Descartes Systems (Belgium) NV, Descartes Systems (Slovakia) s.r.o., Descartes Systems (Czech Republic) s.r.o., Routing France SARL, Routing Iberica "oficina de representation", Descartes labs d.o.o., InterCommIT BV, Infodis BV, Descartes Systems (Netherlands) BV, KSD Software Norway AS, KSD-Edicom AB, Descartes (Switzerland) Ltd., Computdata AG, Descartes Systems (Germany) GmbH, Descartes Systems Australia PTY Ltd., Descartes Systems Japan Inc., The Descartes Systems (Suzhou) Co Ltd., Descartes Systems HK Limited, Appterra (Philippines), Inc., Comax SA, Datamyne do Brasil Servicos de Informaçao Ltda. and Mercosur On Line S.A.