

PRIVACY POLICY

This Privacy Policy governs the manner in which XTRA Corporation and its affiliates (“XTRA”) collect, use, maintain and disclose information collected from users (each, a “User”) of its www.xtra.com, www.xtralease.com, www.xtratrack.com, www.xtrainstall.com, and www.myqualcomm.com (collectively, the “XTRA Web Sites”) and any derivative or affiliated web sites on which this Privacy Policy is posted. Please note that this Privacy Policy covers XTRA’s practices regarding information collected from the XTRA Web Sites.

1. Information About Users XTRA Gathers

We gather information from you when you visit the XTRA Web Sites. Our information gathering activities include, but are not limited to the following:

(a) Information You Give Us.

We receive and store any information you enter in your member registration form, enter in your on-line credit application, or give us in any other way, such as your name, address, phone number, or e-mail address. Information that you provide is used to verify your credit status, to communicate with you regarding the XTRA Web Sites, our business, and our business relationship with you, and to help us operate our business and the XTRA Web Sites effectively. You may opt out of receiving promotions from XTRA based on this information by utilizing the opt-out feature in the Member Profile Section of the xtralease.com web site. If you communicate with us by e-mail or otherwise, complete online forms, surveys or entries, provide information outside of the membership registration process, or otherwise interact with or use the features on the XTRA Web Sites, any information you provide may be collected by XTRA.

(b) Automatic Information

We receive and store certain types of “automatic information” whenever you interact with us. “Automatic information” is information automatically collected by our web server (which may be hosted by a third-party) that your web browser makes available whenever you visit the XTRA Web Sites. This information may include your Internet Protocol address, the identity of your internet service provider, the type of browser that you use, and the date and time of your visit. An Internet Protocol address is a number assigned to your computer when you connect to the Internet.

The XTRA Web Sites also use “cookies.” A “cookie” is a small amount of data that is sent to your computer from a web server and stored on your computer's hard drive. When you initially visit an XTRA Website, a “cookie” is sent to your computer that uniquely identifies your browser. The cookie is read by us each time you visit an XTRA Website. Most browsers are initially set up to accept cookies. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, if your browser is set to refuse cookies, the XTRA Web Sites may not work through your Web browser.

2. How XTRA Uses and Shares Information It Receives

We are not in the business of selling user information to others. We do use and share user information, however, in connection with the ordinary operation of our business.

XTRA may use personally identifiable information collected through the XTRA Web Sites for the specific purposes for which the information was collected, to contact Users regarding products and services offered by XTRA, and otherwise to enhance Users' experience with XTRA. XTRA may also use information collected through the XTRA Web Sites for research regarding the effectiveness of the XTRA Web Sites and the business planning, marketing, advertising and sales efforts of XTRA.

XTRA may record and reproduce information you provide and records created by your use of the XTRA Web Sites for quality assurance and technical assistance purposes or for verifying a User's compliance with this Agreement or the law. XTRA may also combine the information you provide with information derived from other users to create "aggregate data" that we use internally.

XTRA may disclose personally identifiable information collected from Users to its trusted affiliates, independent contractors and business partners who will use the information for the purposes outlined above, as necessary to provide the services offered by XTRA and to provide the XTRA Web Sites itself, and for the specific purposes for which the information was collected.

XTRA may disclose personally identifiable information at the request of law enforcement or governmental agencies or in response to subpoenas, court orders or other legal process, to establish, protect or exercise XTRA's legal or other rights or to defend against a legal claim or as otherwise required or allowed by law. XTRA may disclose personally identifiable information in order to protect the rights, property or safety of a User or any other person. XTRA may disclose personally identifiable information to investigate or prevent a violation by User of any contractual or other relationship with XTRA or the perpetration of any illegal or harmful activity. XTRA may also disclose aggregate, anonymous data based on information collected from Users to investors and potential partners.

Finally, XTRA may disclose or transfer personally identifiable information collected from Users in connection with or in contemplation of a sale of its assets or business or a merger, consolidation or other reorganization of its business.

3. Security of My Information

Information about Users that is maintained on XTRA's systems is protected using industry standard security measures. XTRA does not and cannot ensure, warrant or guarantee the security or integrity of any information transmitted to us over the Internet or stored on our systems. While we endeavor to keep confidential information secure, no security measures are perfect or impenetrable, and XTRA cannot guarantee that the information submitted to, maintained on or transmitted from its systems will be completely secure. XTRA is not responsible for the

circumvention of any privacy settings or security measures relating to the XTRA Web Sites by any Users or third parties.

4. How You Can Remove Information

You may request that we delete any personal information we may have collected about your (address, phone number, e-mail address or other registration information, etc.) from our computers by contacting us directly using the customer service link on the XTRA Web Sites or by contacting customerservice@xtra.com. Please note that in certain circumstances, XTRA may not be able to remove a User's information from its systems. For example, XTRA may retain a User's personal information for legitimate business purposes, if it may be necessary to prevent fraud or future abuse, for account recovery purposes, if required by law or as retained in XTRA's data backup systems. All retained personally identifiable information will continue to be subject to the terms of the Privacy Policy to which the User has previously agreed.

5. Links

Please note that the XTRA Web Sites may contain links to other third party web sites which are not operated or controlled by XTRA. XTRA is not responsible for the privacy practices of these or any other third web sites, and you access these third party web sites entirely at your own risk. XTRA recommends that you review the privacy practices of any other third party web sites you choose to visit.

6. Changes to this Privacy Policy

We reserve the right to revise this Privacy Policy at any time. When we do, we will give you notice of the revised Privacy Policy by posting the revised Privacy Policy on the XTRA Web Sites and by revising the "effective date" at the top of this Privacy Policy. You are responsible for regularly reviewing the current Privacy Policy. The continued use of any of the XTRA Web Sites following the posting of changes to this Privacy Policy constitutes an acceptance of those changes.