

# **UBEEQO PRIVACY POLICY**

## [1. WHO IS PROCESSING YOUR PERSONAL DATA?](#)

## [2. WHAT PERSONAL DATA DO WE COLLECT?](#)

### [2.1. Usage data](#)

### [2.2. Data communicated by the User](#)

### [2.3. Data collected through our connected vehicles](#)

### [2.4. Data transmitted by the authorities responsible for the management of fines for traffic infringements](#)

## [3. WHY DO WE COLLECT YOUR PERSONAL DATA?](#)

## [4. WHO ARE THE RECIPIENTS OF THE PERSONAL DATA WE COLLECT ABOUT YOU?](#)

### [4.1 Categories of recipients](#)

### [4.2 International transfers](#)

## [5. HOW LONG DO WE KEEP YOUR PERSONAL DATA?](#)

## [6. WHAT RIGHTS CAN YOU EXERCISE IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA?](#)

## [7. HOW DO WE PROTECT YOUR PERSONAL DATA?](#)

## [8. WHO TO CONTACT TO EXERCISE YOUR RIGHTS OR IN CASE OF QUESTIONS REGARDING THE PROCESSING OF YOUR PERSONAL DATA?](#)

## [9. CHANGES TO THIS PRIVACY POLICY](#)

### **1. WHO IS PROCESSING YOUR PERSONAL DATA?**

UbeeQo International SASU, whose registered office is located at 696 rue Yves Kermen, 92100, Boulogne-Billancourt, France and UbeeQo UK Limited, whose registered office is located at James House 55 Welford Road Leicester LE2 7AR England are joint controllers for the processing of your personal data, when they deliver mobility solutions services under UbeeQo's brand through their websites or mobile applications.

The terms "we", "us" or "our" used in this policy refer to these joint controllers.

### **2. WHAT PERSONAL DATA DO WE COLLECT?**

Your personal data means any information that allows us to identify you, directly or indirectly, that we collect on our websites, mobile applications or as part of our mobility solutions services.

#### **2.1. Usage data**

Usage data is data generated during your interactions with us when you use our services and includes the following categories of data:

- financial data such as invoices or vehicle insurance data;
- navigation data such as IP addresses, domain names of the devices used, URI (Uniform Resource Identifier) addresses, date, method of sending the request to the server, size of the

file received in response, numeric code indicating the status of the server response (successful, error, etc.), and the name of the server that sent the request. ), the country of your browser, the functionality of your browser and operating system, information about your browsing experience on our sites and applications, in particular the order of pages visited, the duration of the visit, and features about the user's device operating system and IT environment (model, brand for example).

## 2.2. Data communicated by the User

You are free to surf our sites or applications without creating an account. To benefit from our products and services, you must register and provide the requested information.

The data collected for registration and reservation purposes are the following: identification data (first name, last name, gender, date of birth, driver's license number, [identity card, depending on the country], mobile phone number, postal address), audiovisual and electronic data (email, messages, calls exchanged with our customer service, photo, video).

To subscribe to the newsletter, you must provide your email address.

To make payment for our products and services, you must provide your payment details (account number, card number).

If you participate in our satisfaction surveys or interact on our dedicated social media pages, we process data related to your customer satisfaction.

## 2.3. Data collected through our connected vehicles

We collect a variety of information through our connected vehicles, including: vehicle condition, damage or accident information, vehicle performance data, operational and diagnostic data, mileage information, acceleration and braking speeds, fuel consumption and fuel levels, tire pressure, mileage meter readings, vehicle location, and other vehicle information.

## 2.4. Data transmitted by the authorities responsible for the management of fines for traffic infringements

In the context of traffic regulations, we may receive information from the authorities in charge of managing fines relating to traffic violations.

## 3. WHY DO WE COLLECT YOUR PERSONAL DATA?

Through our sites and applications, we offer you self-service car rental services ("car sharing"). To this end, we collect and process your personal data for different purposes and on different legal bases, as set forth in the table below:

<b>Purposes of the processing of your personal data</b>	<b>Legal basis of the processing</b>
<p><u>Creation and management of your account :</u></p> <p>This operation is necessary to identify you as well as to prepare and facilitate your future self-service vehicle reservations.</p>	<p>Your personal data is processed on the basis of the execution of the general conditions of use of our sites and applications.</p>
<p><u>Processing of your reservation :</u></p> <p>(i) confirming your self-service vehicle reservation;</p>	<p>Your personal data are processed on the basis of the execution of the general terms and conditions of car sharing accepted by you (the "car sharing contract").</p>

<p>(ii) modify or cancel your self-service vehicle reservation;</p> <p>(iii) communicate with you in connection with your reservation, by phone or email (for example, to provide you with confirmation of your reservation, to send you a reminder before the start and end of your reservation, to answer your questions or suggestions, etc.) ;</p> <p>(iv) manage your self-service vehicle reservation (provision and return of the vehicle) ;</p> <p>(v) manage your invoices;</p> <p>(vi) manage late payments;</p> <p>(vii) manage any complaints;</p> <p>(viii) manage compensation for potential damage to our vehicles;</p> <p>(ix) manage your insurance.</p>	
<p><u>Verification of your driver's license, either manually or with a facial recognition solution.</u></p> <p>You must submit your driver's license via our application for us to validate it. This validation can be done</p> <p>(i) manually by our customer service department or</p> <p>(ii) by means of a facial recognition device. Images of the driver's licence, your selfie or video selfie (as applicable) will be collected and processed solely for the purpose of driver's licence validation. Wherever possible, driver's license data will be read electronically from the user's driver's license images.</p>	<p>(i) This processing is necessary for the execution of the car sharing contract between you and us.</p> <p>(ii) The use of the facial recognition solution is based on your consent.</p>
<p><u>Management of your payments :</u></p> <p>Namely:</p> <p>(i) the payment of your reservation, subsequent expenses (including fines) and, if applicable, your subscription;</p> <p>(ii) the prevention of credit card fraud.</p>	<p>(i) This processing activity is necessary for the execution of the car sharing contract concluded with us. If you are not a subscriber to our services, the conservation of your credit card for all future payments is based on your consent.</p> <p>(ii) This processing activity is based on our legitimate interest in protecting ourselves against credit card fraud.</p>
<p><u>Vehicle monitoring through the use of connected devices</u></p> <p>The fleet of our vehicles is equipped with Internet-connected devices allowing us to :</p> <p>(i) manage the rental journey, in particular verify the presence of the rented vehicle in the correct departure car park at the start of the rental or in</p>	<p>(i) This processing activity is necessary for the performance of your car sharing contract.</p> <p>(ii) This processing is based on our legitimate interest to manage the fleet and to be able to deliver the services</p> <p>(iii) This processing is based on our legitimate interest to protect the integrity of our Park.</p>

<p>the correct arrival car park at the end of the rental, verify that the vehicle is returned with the sufficient level of fuel, verify that the kilometer package purchased has not been exceeded;</p> <p>(ii) check the condition, performance and functionalities of our vehicles to ensure that each vehicle is in good working order and available for each user's reservation, in particular to check the filling status of the tank or the battery level of a vehicle</p> <p>(iii) locate the vehicle in the event of theft or suspected theft</p> <p>(iv) locate the vehicle in the event of suspected accident in order to provide the necessary material or medical assistance</p>	<p>(iv) This processing is based on our legitimate interest to provide assistance to people</p>
<p><u>Improvement of your browsing experience</u></p> <p>Your usage data is processed for the technical and operational purposes of navigating our sites and applications and improving your customer experience.</p> <p>With this usage data, we adapt our sites and applications to make navigation easier and faster, in particular to provide you with the most appropriate version for your language and country of origin.</p>	<p>This processing activity is based on our legitimate interest in improving our products and services.</p>
<p><u>Conducting customer surveys to improve your experience with our products / services</u></p>	<p>This processing activity, which aims to ensure a better understanding of your needs and to offer you personalized features to improve your experience, is based on our legitimate interest.</p>
<p><u>Promotion of our commercial and promotional activities:</u></p> <p>(i) sending emails and SMS in case of promotions, as well as advertising and personalized promotions specific to your interests regarding our products and services;</p> <p>(ii) sending our newsletters;</p> <p>(iii) organising promotional contests/drawings;</p> <p>The transactional emails sent to you to inform you of the status of your booking are <u>not included in this processing purpose</u>.</p>	<p>These processing activities are based on your consent.</p>
<p><u>Performing statistical analysis :</u></p> <p>We aggregate and anonymize your data for statistical analysis.</p>	<p>This processing is based on our legitimate interest to perform statistical analysis.</p>
<p><u>Management of fines for traffic offences :</u></p>	<p>This procedure is necessary to meet a legal obligation to which we are subject (in particular</p>

<p>This procedure is designed to:</p> <p>(i) match the fines with the driver who rented the vehicle ;</p> <p>(ii) transfer the identity of the driver who has committed a traffic offence to the competent authority (for the processing of fines).</p>	<p>Road Traffic Act 1988 and other similar legislation).</p>
<p><u>Management and update of a list of clients with certain contractual risks for the following reasons:</u></p> <p>(i) payment incidents that have given rise to legal proceedings ;</p> <p>(ii) traffic accidents or repeated damage;</p> <p>(iii) accidents or damage caused voluntarily;</p> <p>(iv) use of our vehicles in violation of the car sharing contract.</p>	<p>This treatment, which aims to reduce our exposure to financial, material or reputational risks of the service, is based on our legitimate interest.</p>
<p><u>Check that you are not placed on any international sanction list</u></p>	<p>This processing is based on our legal obligations regarding economic or financial or trade embargoes imposed, administered or enforced from time to time by (a) the United Nations Security Council, (b) the European Union or any Member State thereof, (c) the U.S. government, including those administered by the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") and the U.S. Department of State, or (d) the United Kingdom</p>

For your information, we collect and process your personal data via "cookies" and other tracers during your visits to its websites or mobile applications. These operations are governed by our [Cookies Policy](#). You can accept or reject these cookies and other tracking devices by following the instructions provided in this Policy.

#### 4. WHO ARE THE RECIPIENTS OF THE PERSONAL DATA WE COLLECT ABOUT YOU?

##### 4.1 Categories of recipients

If necessary, your personal data may be communicated:

- a) to our employees and authorized representatives, to other companies in our group (including Europcar Mobility Group to which we belong), to our agents and authorized intermediaries;
- b) to our subcontractors, who enable us to provide you with our products and services;
- c) to the competent authority in the country where you have committed a traffic violation, for payment of such fines.
- d) to the competent authorities where required and in accordance with applicable law.

##### Use of Facebook

All Facebook features and services available on our website or applications are governed by the Facebook Privacy Policy, which you can read for more information about your rights and settings options.

By using one of our website/applications, you can:

- Use Facebook social plug-ins, such as "like" or "share" our content on the Facebook Platform;

- Accept cookies from our website or applications (also known as "Facebook Pixel"), which will help us understand your activities, including information about your device, how you use our services, the purchases you make, and the ads you view, whether or not you have a Facebook account or are logged in to Facebook.

When you use these Facebook features, we collect data that helps us to:

- Display ads that may be of interest to you on Facebook (or Instagram, Messenger or any other Facebook service);
- Measure and analyze the effectiveness of our website, applications and advertisements.

#### 4.2 International transfers

When it is necessary or useful in order to provide you with its products and services, we transfer (for the purposes set forth herein) your personal data to destinations inside or outside the EU.

In all cases, we have implemented adequate safeguards to protect your personal data in accordance with Regulation (EU) 2016/679 (the "General Data Protection Regulation").

For more information regarding the countries to which your personal data may be transferred, their level of data protection and the protections that may be in place, [click here](#).

#### 5. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Your personal data are kept for different periods depending on the purpose of the processing:

Purposes of the processing of your personal data	Data retention
The creation and management of your account	For the entire duration of the business relationship, except in the following cases: <ul style="list-style-type: none"> <li>- your registration information and booking history will be archived for a period of 6 to 9 months from the time you request cancellation and deletion of your account. Such a period of deletion and anonymization of your personal data will be strictly limited to the purpose of protecting us against any fraudulent or criminal activity ;</li> <li>- information that may constitute proof of any right or that must be kept in accordance with a legal requirement (in particular invoices or proof of transactions) may be subject to interim archiving conditions for a period not exceeding the time necessary to accomplish the purposes for which it is kept, in accordance with the applicable legal provisions.</li> </ul>
The processing of your reservation	For 5 years from the end of the reservation
The verification of your driver's license	For the entire duration of the business relationship and 5 years after the end of the business relationship
The management of your payments	For a period of 13 months from the effective payment date ;

	We retain your credit card number for the payment of your subscription for the duration of your subscription.
The management of our fleet	Up to 9 months from the end of your business relationship with us.
The location of our vehicle in the event of a suspected accident	Up to 9 months from the end of your business relationship with us.
The monitoring of our vehicles	Up to 9 months from the end of the relationship with us.
Improving your browsing experience	Up to 9 months from the end of your business relationship with us.
The improvement of our services according to your preferences	Up to 9 months from the end of your business relationship with us.
The promotion of our promotional and commercial activities	<p>If you are a customer, up to 3 years from the end of your business relationship with us.</p> <p>If you have created an account without having booked a vehicle), up to 3 years from the collection of your personal information or your last request for information.</p>
Performing statistical analysis	Up to 9 months from the end of your business relationship with us.
Management of fines related to traffic offences	<p>For the time necessary to identify the driver (or potential driver) responsible for the offence that caused the fine, which may not exceed 45 days from receipt of the fine. However, certain information may be kept for a longer period (up to 12 months from receipt of the fine), if it is subject to intermediate archiving conditions.</p> <p>Requests from the competent authority for the processing of fines in the country where the reservation was made will be deleted once they have been processed by us.</p>
<p>Management and maintenance of a watch list of clients with certain contractual risks for the following reasons:</p> <p>i. payment incidents that have given rise to legal proceedings ;</p> <p>ii. traffic accidents or repeated damage</p> <p>iii. accidents or damage caused intentionally;</p> <p>iv. use of our vehicles in violation of the car sharing contract</p>	3 years from the occurrence of the event in question.
Cookies	Please refer to our <a href="#">Cookies Policy</a> .
Check that you are not placed on any international sanction list	For 5 years from the collection of your data

## **6. WHAT RIGHTS CAN YOU EXERCISE IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA?**

By clicking on the "My Profile" section accessible on our Sites and Applications, you may at any time view and/or update your profile, which includes registration, driver information and rental preferences. You will be able to change your password, update or correct your telephone number, address and driver's license number, as well as update your rental and travel preferences, including payment method.

Under Regulation 2016/679 (the "General Data Protection Regulation"), you also have the following rights with respect to all personal data processed by us:

a) right of access: right to obtain confirmation that your personal data will be processed by us, and if necessary, right of access to these data and right to obtain further information regarding the characteristics of the processing ;

b) right of rectification: right to have personal data rectified in case of inaccuracy or, having regard to the purpose of the processing, right to complete incomplete data, including by providing an additional declaration ;

(c) right to erasure (also called "right to forget"): right to have your personal data erased when (i) the data are no longer necessary with regard to the purposes for which they were processed, (ii) you withdraw your consent and there is no other legal basis for the processing, (iii) you object to the processing of your personal data and there is no overriding legitimate reason for the processing, (iv) it has been established that your personal data have been processed unlawfully, (v) the personal data must be erased in order to comply with a legal obligation applicable to us;

d) right to limit the processing so that your personal data are not processed by us for a defined period of time.

You can exercise this right when :

i) you dispute the accuracy of your personal data, and this for a period of time that allows us to verify the accuracy of your personal data;

ii) the processing of your personal data is unlawful and you oppose their deletion and demand instead the limitation of their use;

iii) we no longer need your personal data, but that you still need them to establish, exercise or defend your rights in court;

(iv) you object to the processing operation on grounds relating to your particular situation, during the verification of whether the legitimate reasons pursued by us prevail over yours

e) right of opposition: right to refuse, at any time, the processing of your personal data to prevent us from continuing such processing :

i. when the processing is based on our legitimate interest. In this case, your request will be satisfied only if you provide us with a description of the situation in question that legitimizes your request, provided that we are not able to prove the superiority of its legitimacy in light of the situation in question ;

f) right to withdraw your consent: when the processing of your personal data is based on your consent

g) right to data portability: when the processing of your personal data (i) has been carried out by automated means and (ii) is based on your consent or on the execution of a contract, you have the right to receive the personal data provided to us, and to transmit such data to a third party.

To protect your privacy and security, we will take all necessary steps to verify your identity before granting any access or making any corrections.

You have the right to lodge a complaint regarding the processing of your personal data with the competent data protection authority in your country. In England, the supervisory authority is the Information Commissioner's office at [ico.org.uk](http://ico.org.uk). We invite you to contact us at the contact details below before making any complaint to the competent data protection authority.



## **7. HOW DO WE PROTECT YOUR PERSONAL DATA?**

We are committed to protecting the information it collects through this website. In particular, we use appropriate physical, technical and organizational security measures to prevent unauthorized or unlawful processing, accidental loss of or destruction of or damage to your personal data.

Our systems are configured with data encryption, or scrambling technologies, and industry-standard firewalls. When you send personal information to a website over the Internet, your data is protected by the TLS (Transport Layer Security) encryption/decryption to ensure safe transmission.

Any credit card transaction you make through our websites is done through our PCI DSS compliant payment service providers which ensure the security and protection of your payment methods and transactions.

## **8. WHO TO CONTACT TO EXERCISE YOUR RIGHTS OR IN CASE OF QUESTIONS REGARDING THE PROCESSING OF YOUR PERSONAL DATA?**

If you wish to know more about the provisions of this privacy policy or to contact our Data Protection Officer, you can also write to us:

- to the following address: UbeeQo International, 696 rue Yves Kermen 92100 Boulogne-Billancourt, France

- or by e-mail to: [dpo@ubeeqo.com](mailto:dpo@ubeeqo.com)

To exercise your rights, you must prove your identity by clearly indicating your surname, first name and any useful information allowing us to identify you (such as the place and date of your last vehicle rental). You must also give us the e-mail address or the physical address to which you would like the reply to be sent to you.

## **9. CHANGES TO THIS PRIVACY POLICY**

This privacy policy was updated on 05.05.2021. If we change this privacy policy, you will be notified of the changes on this page.