

Privacy Policy

1. Who processes your personal data collected through this website?

Ubeeqo International SASU, whose registered office is located at 696 rue Yves Kermen, 92100, Boulogne-Billancourt, France, (hereinafter referred to as “**Ubeeqo**” or as “**us**”) is responsible for processing the personal data belonging to you (the “**User(s)**” or “**You**”). Your personal data refers to any information that would allow us to identify you, either directly or indirectly and which is collected through this website or through our Android or IOS mobile applications.

2. Which type of personal data is collected?

2.1. Usage data

The navigation on Ubeeqo’s sites and applications (as well as the use of any third party’s application embedded and/or available therein), implies the communication to Ubeeqo of usage data, which is implicitly acquired during the navigation of the user through the internet communications protocol (“**Usage Data**”).

Usage data includes among other, the IP addresses or domain names of the devices utilized by the Users, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server’s answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within Ubeeqo) and the details about the path followed within Ubeeqo with special reference to the sequence of pages visited, and other parameters about the device’s operating system and/or the user’s IT environment.

Usage data is not collected for the purpose of identifying the User. However, you must be aware that the identification may be possible through further elaborations and associations, as well as with information held by third parties.

2.2. Data communicated by the User

Users are free to navigate the Ubeeqo sites or applications but, to use the service, Users need to register and disclose the information requested in the relevant forms in a complete and truthful manner.

Whenever a field is described as “optional” or “not compulsory” or is not marked with “*” symbol it means that user is free not to communicate the requested data and that the registering of the User can go ahead notwithstanding the absence of this information. The Data collected by Ubeeqo for registration purposes are: first name, last name, gender, date of birth, driving license, mobile phone number, address. To subscribe to the newsletter, Users shall be requested to provide their email address.

The explicit, optional and voluntary sharing of User’s email address in the contact forms provided on Ubeeqo implies that the relevant email address, as well as any other data communicated, is acquired by Ubeeqo for satisfying the contact request. Users are kindly invited to not share any third parties’ data unless this communication is strictly necessary for the request made. Users are responsible for any third-party personal data obtained, published or shared through Ubeeqo and confirm that they have the third party’s consent to provide the data to Ubeeqo.

In addition to the information contained in this privacy policy, Ubeeqo may provide the User with additional and specific information concerning other services or the collection and processing of personal data upon request.

2.3. Cookies

For your full information, Ubeeqo carries out certain processing of your personal information through "cookies" and other tracers collected every time you visit Ubeeqo website. These processing are governed by Ubeeqo Cookies Policy, which we encourage you to review. You can accept or reject these cookies and other tracers by following the instructions provided in Ubeeqo Cookies Policy.

3. For what purposes does Ubeeqo collect your personal data?

Through our website and mobile applications, Ubeeqo provides you with carsharing rental services. To that end, Ubeeqo processes personal data that you voluntarily provide to Ubeeqo. for the following purposes:

a) Your registration as a Ubeeqo member and creation of your account

This processing is necessary to identify you and to prepare and facilitate your future carsharing rental bookings with Ubeeqo. The personal data submitted for the purposes of the registration of your account refers to the personal data You are required to provide in order to activate your account and access our car sharing rental services (these include among others: your full name, address, age, driving license, a selfie of yourself, a video selfie etc...)

b) Verification of Driving license & Identity verification

Spain

Once your account is created and before accessing the rental of Ubeeqo vehicle in Spain, the images of the driving license along with his selfie and video selfie (as the case may be) he has created will be collected and processed for the purpose of driving licence validation. The driving licence data are read out electronically from the images of User's driving licence, if possible, otherwise, the data is manually transcribed by our customer service team. The images of User's face are compared with the images of User's driving licence (facial alignment). These image files are verified as part of manual reconciliation by our customer service. The images will be stored for permanent proof of properly conducted driving licence verification for the period necessary for compliance with legal obligations to which Ubeeqo is subject.

The above-mentioned processing is necessary in order to adhere our duty of care, consisting in performing diligent verification of your driving license as laid down in applicable laws and jurisprudence, to which Ubeeqo is subject in the context of rental of Ubeeqo vehicle to the customers. The legal basis of the processing is Art. 6 para. 1 lit. c) GDPR.

UK

Once your account is created and before accessing the rental of Ubeeqo vehicle in UK, you are asked to upload the images of the front and the back of Your driving license (and ID card depending upon your home jurisdiction) to take a selfie using your device's camera (or alternatively film yourself with some tasks for the proof that you are a real human) for the following purposes:

a. Verification of Driving license

Certain basic identifiers are extracted from the images of the front and the back of Your driving license in order to determine your right to drive, including extraction of driving license category, obtainment date, and expiry date. In addition, our third-party provider Onfido applies document authenticity and fraud detection techniques based on artificial intelligence and machine-learning technology aiming to verify that your driving license hasn't been compromised, lost, or stolen.

The above-mentioned processing is necessary in order to adhere our duty of care, consisting in performing diligent verification of your driving license as laid down in applicable laws and jurisprudence, to which Ubeeqo is subject in the context of rental of Ubeeqo vehicle to the customers. The legal basis of the processing is Art. 6 para. 1 lit. c) GDPR.

b. Identity Verification

The images of Your face are compared with the images of Your driving licence (facial alignment) in order to verify that the person in the selfie is the same person than in the identity document. Above mentioned process is conducted manually by our customer service.

This processing consisting of identity verification aiming at detecting and preventing any misrepresentation of the identity is based on Ubeeqo's "legitimate interest" pursuant to Art. 6 para. 1 lit. f) GDPR, and is necessary in order to adhere our duty of care, consisting in performing diligent verification that person in the selfie is the same person as the one on the uploaded driving license image as laid down in applicable laws and jurisprudence, to which Ubeeqo is subject in the context of rental of Ubeeqo vehicle to the customers. The legal basis of the processing is Art. 6 para. 1 lit. c) GDPR.

If the quality of the pictures provided by you is insufficient, if the identity document is not supported or if the analysis indicates that there are signs of fraudulence, we may not be able to provide you with access to rental Ubeeqo vehicles. You may also be asked to start the identification process again or provide additional information.

c) Driving record (applicable to the UK driving license holders)

We process User's driving record held on the DVLA database including driving entitlements, valid endorsements and disqualifications (if relevant) for the following purposes:

- ensuring User's continuing fitness and legality to hold a driving license. Ubeeqo is required to do so in order to fulfil duties and obligations laid down in applicable laws and regulations pursuant to Art. 6 para. 1 lit. c) GDPR.
- safeguarding our contractual claims vis-à-vis insurance companies arising out of occurrence of damaging action against our vehicles based on our legitimate interest pursuant to Art. 6. para 1. lit. f) GDPR.

d) The processing of your booking:

- to confirm your carsharing rental booking;
- to modify or cancel your carsharing rental booking;
- to exchange with you in relation to your booking (e.g. to provide you with information on your booking, to send you reminder notice before your check-in/check-out, to respond to your questions or suggestions);
- to manage your carsharing rental booking (delivery and return of the vehicle);

- to manage your invoices;
- to manage the payment of arrears;
- to manage potential claims;
- to manage the recovery of potential damages to Ubeeqo vehicles;
- to manage your insurance.

The processing purposes highlighted above are necessary for the booking and the performance of the carsharing rental terms and conditions entered into with Ubeeqo (the “**Carsharing Agreement**”) pursuant to Art. 6 para. 1 lit. b) GDPR.

e) Payment purposes

This processing is necessary for the performance of the Carsharing Agreement, which is concluded between you and Ubeeqo pursuant to Art. 6 para. 1 lit. b) GDPR. For the duration of our commercial relationship with you, Ubeeqo shall retain your credit card information in order to facilitate your subscription and booking payments.

f) Ubeeqo vehicles monitoring through the use of vehicle connected devices:

Ubeeqo provides its carsharing rental services in a fully digital and automated way through Ubeeqo’s software platform and onboard vehicle technology. As a result, Ubeeqo’s fleet is equipped with devices which feature internet connectivity.

The purpose of such devices and the data collected through them enables Ubeeqo:

- to monitor the state, the performance and the functionalities of Ubeeqo vehicles. For example, this allows Ubeeqo to verify whether the fuel tank of the vehicles is sufficiently full or not, if the vehicle battery level is appropriate or not etc... Such information aims to ensure that each Vehicle is in good working condition and is available for User bookings.
- to identify potential breaches of the Carsharing Agreement (for example making sure that the User has (i) returned the Vehicle with the sufficient level of fuel, (ii) not exceeded the kilometer package purchased, (iii) returned the Vehicle to the dedicated parking spot etc...);

This processing, aiming at protecting the integrity of Ubeeqo fleet, is based on Ubeeqo’s “legitimate interest” pursuant to Art. 6 para. 1 lit. f) GDPR.

g) Ubeeqo vehicles monitoring based on geolocation systems and its internet access devices:

As a result, Users must be aware that (i) geolocation systems and (ii) internet connection devices are embedded in Ubeeqo’s fleet of carsharing vehicles.

Geolocation systems have been installed by Ubeeqo to verify the presence of the rented vehicle in the correct departure car park at the start of the rental and to verify the presence of the rented vehicle in the correct return car park at the end of the rental. Such geolocation systems allow Ubeeqo to make sure that the Vehicles are situated in their designated area and are available for booking.

Such information shall also be used for the purposes listed below:

- to prevent any fraud and/or damaging action against its property as well as to provide Users with a better service. For example, geolocation systems allow Ubeeqo to make sure its Vehicles are returned on time in their designated

parking or alternatively (i) allow Users to extend their booking or (ii) mitigate any consequences for the User whose Vehicle has been delayed.

- Location of the vehicle in the event of theft or suspected theft.
- Location of the vehicle in the event of a suspected accident in order to provide assistance or emergency medical treatment.

The location of the User is collected solely for the above purposes.

This processing, aiming at protecting the integrity of Ubeevo's fleet, is based on Ubeevo's "legitimate interest" pursuant to Art. 6 para. 1 lit. f) GDPR and is necessary for the performance of the Carsharing Agreement between you and Ubeevo pursuant to Art. 6 para. 1 lit. b) GDPR.

h) Improvement of your navigation experience

Usage Data of the User is solely processed to permit the navigation of the User on Ubeevo's sites and applications from an operational and technical point of view and to improve the User's navigation experience. Based on such Usage Data, Ubeevo will be able to adapt its website to ensure easier and quicker navigation. For example, Usage Data allows us to make sure Ubeevo's website is the most relevant to you depending on your language and country of origin.

i) Improvement of Ubeevo services on the basis of:

- customer surveys you have completed;
- the recording of your carsharing history to suggest you pre-selected options when looking for a new booking.

This processing, aiming at having a better understanding of Ubeevo members' needs and offering you customized functions to enhance your experience of Ubeevo products/services, is based on Ubeevo's "legitimate interest" pursuant to Art. 6 para. 1 lit. f) GDPR.

h) Promotional and marketing activities, upon your consent, namely:

- the sending of email and SMS for special promotions/deals as well as customized advertisements and promotions that are targeted to your specific interest about Ubeevo products/services;
- the sending of Ubeevo's newsletters;
- the sending of emails about a booking you did not complete or send you a summary about a booking enquiry;
- the management of your loyalty program;
- the organization of promotional contests/sweepstakes;
- the management and update of Ubeevo's customers/prospects database.

Direct marketing processing, i.e. any commercial message from Ubeevo aiming at promoting Ubeevo services, are subject to your prior, free, informed and express consent pursuant to Art. 6 para. 1 lit. a) GDPR.

By exception:

- if you are already a Ubeevo existing customer and that the message concerns services similar to those you have already purchased, the underlying

processing will not be based on your consent but on Ubeevo's "legitimate interest" pursuant to Art. 6 para. 1 lit. f) GDPR; and

- the sending of transactional emails (concerning for example the updating of the Carsharing Terms and Conditions, the confirmation of your booking...) are necessary for the performance of the Contract between you and Ubeevo pursuant to Art. 6 para. 1 lit. b) GDPR.

j) Statistical purposes

This processing aims at carrying out anonymous and aggregated statistical analyses of the Usage Data of the customer.

k) The management of fines:

This processing aims to:

- to transfer to the relevant competent authority - dealing with the processing of fines - the identity of the driver who has committed a traffic violation or offence;
- to satisfy fines collection procedure to which Ubeevo may be subject.

This processing is required by law pursuant to Art. 6 para. 1 lit. c) GDPR.

l) The management and update of a watchlist of customers presenting certain contractual risks based on:

- payment incidents which have given rise to legal proceedings;
- vehicle accidents or repeated damages caused by Ubeevo customer;
- accidents or damages caused voluntarily by Ubeevo customer;
- use of Ubeevo's vehicles in breach of the Carsharing Terms and Conditions.

This processing, aiming at reducing Ubeevo risks exposure in the performance of the Carsharing Agreement, is based on Ubeevo's "legitimate interest" pursuant to Art. 6 para. 1 lit. f) GDPR.

m) The processing of personal data for the purpose of law enforcement

Should any willful act of misconduct, fraud or criminal offence (other than traffic violations or offences mentioned above) be perpetrated against Ubeevo, personal data could be used, under certain circumstances, for ascertaining individual responsibilities and transferred to competent authorities.

In addition, your personal data may be processed for the purpose of fulfilling the duties and obligations laid down in applicable laws and regulations. The legal basis is Art. 6 para. 1 lit. c) GDPR. The User declares to be aware that Ubeevo may be required to reveal personal data upon request of the relevant public authorities.

n) Fraud detection and prevention

To prevent fraud and misuse, and to keep frauds, scammers and other (vehicle) criminals away, Ubeevo profiles your personal data for fraud detection.

Profiling means any form of automated processing of your personal data to evaluate certain personal aspects about you, such as to analyse or predict aspects concerning your economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Ubeeqo may detect that an account is being used in ways that fraudsters work or Ubeeqo may notice that an account is being used in a way that is unusual for you. If Ubeeqo believes there is (a risk of) fraud, Ubeeqo may stop activity on your account or refuse access to your account. Note, if, based on the profiling, we detect or we have reasonable grounds to believe that any fraud, scam or criminal activity is attributable to you, we will process your personal data to prevent your future use of our service through our watchlist. In that case, Ubeeqo may also provide your information to the competent authorities

The profiling and processing of these personal data aiming at detecting and preventing fraud is based on the legitimate interests pursued by Ubeeqo pursuant to Art. 6 para. 1 lit. f) GDPR.

4. Who are the data recipients of the personal information we collect about you?

4.1 Categories of recipients

Your personal data will be disclosed, as necessary and/or relevant to:

- a) the authorized personnel of Ubeeqo and the entities of the same group (including the Europcar group to which Ubeeqo belongs) and/or entities – the case being – belonging to Ubeeqo's franchise network for the purposes described in this privacy policy;
- b) the sub-processors of Ubeeqo, which are third-party service providers that collect data in order to help Ubeeqo in providing you with its products/services. The legal basis is Art. 6 para. 1 lit. b) GPDR. To know more about the list or categories of such service providers, please [click here](#) ;
- c) regarding the information processed for the payment of fines, to the relevant competent authority – in the country where the User made the booking – dealing with the processing of fines. The legal basis is Art. 6 para. 1 lit. c) GPDR;
- d) Ubeeqo can also disclose your personal data to the extent required by law and/or by competent authorities. The legal basis is Art. 6 para. 1 lit. c) GPDR.
- e) If you initiate a chargeback or other reversal of payment transaction related to Ubeeqo carsharing rental services, it may be necessary for Ubeeqo to share your personal data with the relevant financial institution via Ubeeqo's payment service provider, so that it can determine whether the contested payment transaction was legitimate or not. This processing activity consisting of submission of evidence, including personal data, to the extent necessary to contest the chargeback, aims to protect Ubeeqo's right to property and is based on Ubeeqo's "legitimate interest" pursuant to Art. 6 para. 1 lit. f) GDPR.

The Data communicated is limited to that which is strictly necessary to provide our services. The communication of such Data shall be limited to that which is required to allow Ubeeqo to meet its contractual and legal obligations. Whenever Your personal data is shared with a third-party, Ubeeqo will only do so after entering into a contract with the third-party in which the latter undertakes to protect all personal data using appropriate security measures and not to use that personal data for purposes other than those disclosed above.

4.2 International transfers

As necessary or useful to provide you with Ubeeqo products/services, Ubeeqo will – for the purposes set forth herein – transfer your personal data outside the EU to third-parties, as identified in [Appendix 2](#) .

Depending on the case, certain recipients may be located in countries which have been recognized by the European Commission as ensuring an adequate level of data protection or in countries which has not been recognized as ensuring such a level of protection. In any case, Ubeeqo has put in place appropriate safeguards to protect your personal data, in compliance with GDPR.

To find more information regarding the countries where your personal data can be transferred, their level of data protection and the potential safeguards put in place by Ubeeqo, please [click here](#) .

5. For what period will Ubeeqo retain your personal data?

Your personal data are retained for different period, depending on the purposes of the processing:

Purpose	Retention period
Your registration as a Ubeeqo member and the creation of your account Your carsharing rental booking	For the duration of the commercial relationship. However, please note that : your registration information and booking history will be archived for a period varying between 6 to 9 months as of the moment you have requested the cancellation and deletion of your registration account. Such delay in the deletion and or anonymization of your personal data shall be strictly limited for the purposes of protecting Ubeeqo against any fraudulent or criminal activity; - information that may evidence a right or that must be kept in compliance with a legal requirement (such as invoices or proof of transactions), may be subject to an intermediate archiving policy for a period of time that does not exceed the time that is necessary for the purposes for which it is kept, in accordance with applicable legal provisions.

Payment	The only information Ubeeqo can access concerning Your payment method are the expiration date of the card and the name of the cardholder. However, such information that may evidence a payment is subject to an intermediate archiving policy for a period of time of 13 months after the effective payment for a credit card and 15 months for a deferred debit card, to be used only if the transaction is disputed;
Ubeeqo vehicles monitoring through the use of vehicle connected devices	Up to 9 months as from the end of your commercial relationship with Ubeeqo
Ubeeqo vehicles monitoring based on geolocation systems	Up to 3 months as from the end of your rental booking
Improvement of your navigation experience and Ubeeqo services depending on your preferences	Up to 9 months as from the end of your commercial relationship with Ubeeqo.
Promotional and marketing activities	For Ubeeqo customers, up to 3 years as from the end of the commercial relationship with Ubeeqo For prospects – who are not Ubeeqo customers – up to 3 years as from the collection of your personal information OR as from the last request for information you made
Statistical Analysis	Up to 9 months as from the end of your commercial relationship with Ubeeqo.
Cookies	Please check Ubeeqo Cookies Policy
Payment of fines	For the time necessary to identify the driver (or the potential driver) liable for the infraction leading to the fine, which cannot exceed 45 days after receipt of the fine. However, relevant information can be kept for a longer period of up to 12 months after receipt of the fine, subject to an intermediate archiving policy. Requests from the relevant competent authority dealing with the processing of fines in the country where the booking has been made will be deleted once the requests have been proceeded by Ubeeqo

The management and update of a watchlist of customers presenting certain contractual risks, namely: i. payment incidents which have given rise to legal proceedings; ii. vehicle accidents or repeated damages caused by UbeeQo customer; iii. accidents or damages caused voluntarily	3 years as from the occurrence of the relevant event
iv. the use of UbeeQo vehicles in breach of the Carsharing Terms & Conditions	5 years as from the occurrence of this event

6. What rights can you exercise with respect to the processing of your personal data?

At any time, you can view and/or update your personal profile, which includes member registration, driver information and rental preferences information, through the "My profile" section accessible on the UbeeQo website. You will be able to change your password, update or correct phone number, address, and driving licence information and update your car rental and travel preferences including means of payment.

As per GDPR, you can also benefit from the following rights:

a) right of "access": right to obtain confirmation as to whether or not your personal data are being processed by UbeeQo, and, where that is the case, to access to these personal data and to obtain further information on the characteristics of their processing;

b) right "to rectification": right to obtain the rectification of inaccurate personal data or, taking into account the purposes of the processing, the right to have incomplete personal data completed, including by means of providing a supplementary statement;

c) right to "erasure" (or the so-called "right to be forgotten"): right to obtain the erasure of your personal data in certain circumstances;

d) right to "restriction": right to obtain restriction of processing under certain circumstances [1] . Should the processing of your personal data be restricted, such data can only be further processed subject to your consent (save for storage purposes) and you will be informed before the restriction of processing is lifted;

e) right to "object": at any time, a right to object to the processing of your personal data to prevent UbeeQo from continuing to carry out such processing:

- where your data are processed for direct marketing purposes;
- where your personal data are processed on the basis of UbeeQo's legitimate interest. In that case, your request will be satisfied only if you provide UbeeQo with a description of the particular situation legitimating your request and save if UbeeQo can demonstrate overriding legitimate grounds in light of your particular situation.

f) right to "withdraw your consent": where the processing of your personal data is based on your consent, a right to withdraw your consent to the processing of your

personal data at any time and to prevent UbeeQo from continuing to carry out such processing;

g) right to "data portability": where the processing of your personal data is based on your consent and by automated means, the right to receive the personal data you provided to UbeeQo, in an spreadsheet [2] and to transmit those data to a third party;

If you wish to exercise any of these rights, please contact us via the relevant email address according to your country, as set out below under Section 8. In addition, in UbeeQo's promotional and marketing emails and other communications, UbeeQo also includes instructions on how to unsubscribe.

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

As per article 77 of the GDPR, you can lodge a complaint about the processing of your personal data with the body regulating data protection in your country [3] if you consider that the processing of your personal data infringes the said GDPR.

7. How does UbeeQo protect your personal data?

UbeeQo is committed to protecting the information it collects through this website. In particular, UbeeQo uses 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.

UbeeQo's systems are configured with data encryption, or scrambling technologies, and industry-standard firewalls. When you send personal information to a UbeeQo 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 UbeeQo websites is done through our PCI DSS compliant payment service providers which ensure the security and protection of your payment methods and transactions.

8. What happens if you fail to provide certain personal data?

Where the processing of Your personal data is necessary for the performance of the Carsharing Agreement or to carry out pre-contractual activities at Your request or for the purpose of fulfilling duties and obligations laid down in applicable laws and regulations and You fail to provide that personal data when requested, we may not be able to perform the Carsharing Agreement entered into/to be entered with You. In this case, we may have to cancel our engagement or said agreement. We shall notify if this is the case at the time.

9. Who to contact when you have a query regarding the processing of your personal data?

Depending on the purpose of your query, you will find below:

a) For general query regarding the processing of personal data carried out by UbeeQo please contact legal@ubeeqo.com;

b) To exercise your rights (access, rectification, erasure, restriction, etc.):

- Belgium: privacy.be@ubeeqo.com
- Germany: privacy.de@ubeeqo.com
- France: privacy.fr@ubeeqo.com
- Italy: privacy.it@ubeeqo.com

- UK: privacy.uk@ubeeqo.com
- Spain: privacy.es@ubeeqo.com

c) For legal notifications: UbeeQo International SASU, 696 rue Yves Kermen, 92100, Boulogne-Billancourt, France, and registered under number 491.048.575.

10. Changes to this Privacy Policy

This privacy policy was published on March 18, 2020. In the case of changes to this privacy policy by UbeeQo, such changes will be identified by UbeeQo on this webpage.

When a change impacts a processing carried out on the basis of your consent, UbeeQo will contact you to obtain a new consent.

[1] If (i) you contest the accuracy of the personal data, (ii) it is demonstrated that the processing is unlawful and you oppose to the erasure of the personal data but you would like to request the restriction of its use instead, (iii) UbeeQo no longer needs the personal data for the purposes of the processing but they are required by you for the establishment, exercise or defence of legal claims.

[2] Or any other commonly used and machine-readable format.

[3] The country where you have your habitual residence, place of work or place of the alleged infringement.