



PRIVACY POLICY

2020

WeGo B.V.

www.wegocarsharing.com
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Willem Fenengastraat 2a, 1096 BN, Amsterdam, The Netherlands

Chamber of Commerce No.: 52275965
IBAN: NL95ABNA0453886876
VAT No.: 850373062B01



This carsharing platform is managed by WeGo B.V. and when you use WeGo carsharing services, you trust us with your personal data. In this Privacy Policy we want to give you clear and transparent information about how we use your personal data.

We will do everything to protect your privacy, and therefore we use your personal data carefully. In all cases, WeGo B.V. behaves in conformity with the applicable law, as per the General Data Protection Regulation.

This implies that we:

- Process your personal data in accordance with the purpose why these are provided. These purposes and type of personal data are described in this policy.
- Process only the minimum data necessary for the purposes
- Ask explicit permission to use your personal data if necessary for processing
- Have taken the necessary technical and organisational measures to ensure the security of your personal data
- Do not transfer your personal data to third parties, unless essential for the execution of the purposes
- Are aware of your rights, inform you about them and respect them

As WeGo B.V. we are responsible for processing your personal data. Please contact us if you have any further questions.

INFORMATION THAT WE COLLECT

We use the information that we collect from our services to provide, maintain, protect and improve them, to develop new ones and to protect WeGo and our users. We do not collect any sensitive personal information relating to confidential medical facts, racial or ethnic origins, political or religious beliefs or sexuality.

We collect information in the following ways:

- Information you give us, such as your name, email address and phone number.
- Information we get from your use of the WeGo services, such as

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- **Log information:**

When you use our services we automatically collect and store certain information in server logs. This includes but is not limited to:

- details of how you used our service
- telephony log information, such as your phone number, time and date of calls to our helpdesk, duration of these calls
- internet protocol address of your smartphone when using the WeGo App
- browser type, browser language, the date and time of your visits
- cookies that may uniquely identify your browser
- Unique Bluetooth identifier of your smartphone when locally connecting to the WeGo Box

- **Location info**

When you use our services, we may collect and process information about your actual location. We use various technologies to determine location, including IP address, GPS and other sensors.

- **Local storage**

We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage and application data caches.

- **Google Analytics**

WeGo uses Google Analytics to track how its services and website are being used. WeGo uses Google Analytics-cookies, has a processing agreement with Google, masks the user's 4th IP address octet, has disabled 'share data' and doesn't use any other Google services in combination with Google Analytics cookies.

See Appendix A for a detailed overview of what information we collect, why we collect it and for how long it is kept.

How we use information that we collect:

- We use the information that we collect from our services to provide, maintain, protect and improve them, to develop new ones and to protect WeGo and our users. We also use this information to offer you tailored content like:
 - only show Vehicles that are available to be booked
 - only show you the available Vehicles within walking distance

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- show Vehicles you have used in the past on top of the list when making a new booking
 - generate invoices that already have your personal details filled out
 - We process your personal information and the information that we collect from our services on our servers within the EU.

ACCESSING AND UPDATING YOUR PERSONAL INFORMATION

- Whenever you use our services, we aim to provide you with access to your personal information. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes.
- We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

INFORMATION THAT WE SHARE

We do not share personal information with companies, organisations and individuals outside of WeGo unless one of the following circumstances applies:

- **With Fleet Managers**
If your WeGo account is managed for you by your Fleet Manager then your Fleet Manager who provides user support to you will have access to your WeGo account information (including personal data). Your Fleet Manager may be able to:
 - view statistics regarding your account, such as statistics regarding use of the carsharing service
 - change your account password
 - suspend or terminate your account access
 - access or retain information stored as part of your account
 - receive your account information in order to satisfy applicable law, regulation, legal process or enforceable governmental request
 - restrict your ability to delete or edit information or privacy settings

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- **For external processing**

We provide personal information to our trusted sub processors to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

- **For legal reasons**

We will share personal information with companies, organisations or individuals outside WeGo if we have a belief in good faith that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, legal process or enforceable governmental request
- enforce applicable Terms of Service, including investigation of potential violations
- detect, prevent or otherwise address fraud, security or technical issues
- protect against harm to the rights, property or safety of WeGo, our users or the public, as required or permitted by law

We may share non-personally identifiable information publicly to show trends about the general use of our carsharing services in our marketing materials.

If WeGo is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

WeGo does not share any personal data with a sub processor without a sub processor agreement that is compliant to General Data Protection Regulation.

INFORMATION SECURITY

We work hard to protect WeGo and our users from unauthorised access to or unauthorised alteration, disclosure or destruction of information that we hold. In particular:

- We encrypt many of our services using Secure Socket Layer.
- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorised access to systems.

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- We restrict access to personal information to WeGo employees, contractors and agents who need to know that information in order to process it for us and who are subject to strict contractual confidentiality obligations. They may be disciplined or their contract terminated if they fail to meet these obligations.

WHEN THIS PRIVACY POLICY APPLIES

Our Privacy Policy applies to all of the services offered by WeGo B.V. Our Privacy Policy does not apply to services offered by other companies or individuals linked from our services. Our Privacy Policy does not cover the information practices of other companies and organisations that advertise our services.

COMPLIANCE AND COOPERATION WITH REGULATORY AUTHORITIES

We regularly review our compliance with our Privacy Policy. We also adhere to General Data Protection Regulation (GDPR). When we receive formal written complaints, we will contact the person who made the complaint to follow up.

We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

RIGHT TO BE FORGOTTEN

New under GDPR is a User's right to be 'forgotten' by the WeGo service via the Fleet Manager. Since physically deleting is not possible we will anonymize the User's profile data instead.

A request will be completed within a maximum of 8 weeks to take into account a period for receiving fines and closing of all invoices. Reports available for legal/tax/cost purposes will not be available anymore for this User after performing the request.

Invoices will remain in the WeGo Backoffice since there is a legal obligation to keep invoices for tax and legal purposes.

The WeGo service data retention for backups is 4 weeks, the maximum lead time to be 'forgotten' is therefore 12 weeks in total.

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RIGHT ON DATA PORTABILITY

Also new under GDPR is a User's right to have their information exported from the WeGo services. The User can export their historical booking information through the WeGo website.

DATA RETENTION

WeGo B.V. stores your personal data no longer than strictly necessary by law or for the purposes of processing. WeGo will automatically disable a user account after 2 years of inactivity and anonymize this data after another 2 years of inactivity.

CHANGES

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any Privacy Policy changes in the WeGo App and we will also keep prior versions of this Privacy Policy in an archive for your review.

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Appendix A

User name

Unique identifier of a user needed to be able to login to the WeGo services. Since the User can determine this User name themselves this could contain personal information (typically e-mail address).

Email

The e-mail address is used for:

- Communication during the various processes when using the WeGo services, such as confirmations of bookings made, trips made, status of the User, invoicing
- Marketing purposes (after haven given consent)

This information can be viewed and adjusted by the User

First name

Used to personalize communication (optional)

Middle name

These fields are used together to properly name the User in order to:

Last name

- correctly create Invoices, addressed to the right person
- Identify the User in reports for Administrators

This information can be viewed and adjusted by the User

Home Street Name

The Home Address of the User is used to:

Home House No

- correctly create Invoices, addressed to the right person
-

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Home House Extension

(optional, but mandatory when the user needs to get invoiced)

Home Zip Code

This information can be viewed and adjusted by the User

Home City

Phone Number

Used in order for Fleet Managers to get in contact with the User for reasons related to the Service provided (optional)

This information can be viewed and adjusted by the User

Mobile Number

Used in order for Fleet Manager to get in contact with the User for reasons related to the Service provided

This information can be viewed and adjusted by the User

Booking information

A Vehicle can only be used by the User when making a Booking. This information is used to:

- Determine the duration and distance driven by the User
- Based on this information the cost for using the vehicle is determined
- The cost subsequently can be assigned to the right User
- Analyze a fault or problem situation in order to assist the User or to improve the system
- The information is used for reporting for both the Fleet Manager as well as the User themselves and can be used to indicate whether the usage of the

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Vehicle is for Private or Business use for fiscal reporting

This information can be viewed but not adjusted by the User

Location information

When using a Vehicle its location is determined every 20 seconds which is related, via a booking, to the User.

The location of the Vehicle, in relation to the User, is used to:

- Determine the distance and duration of Vehicle used by the User
- Determine the average speed driven by the user
- Based on this information the cost for using the vehicle is determined
- The cost subsequently can be assigned to the right User
- Analyze a fault or problem situation in order to assist the User or to improve the system

In the setup of the WeGo service accessibility to this information can be restricted to selected Fleet Manager(s)

This information can be viewed but not adjusted by the User

Driver License Number

This can be required by the Fleet Manager to identify and validate the Person wanting to use a Vehicle (optional)

Driver License Birthdate

This information cannot be viewed or adjusted by the User

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IBAN number / BIC Code

The bank account number and BIC Code can be required to in order to use the WeGo services when using Direct Debit payment methods via OnlinePaymentPlatform.

This information can be viewed and adjusted by the User

Event Logging information

Whatever activities a user is performing using the WeGo system is logged. This information is used in case of problem solving or to improve the system.

This information cannot be viewed or adjusted by the User

Invoices

Personal information of User is used in Invoices and reports. Invoices are kept in the system for legal purposes.

This information can be viewed but not adjusted by the User
