

# PRIVACY POLICY

## 1. BASIC INFORMATION

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<b>Data Controller</b>	CARSHARING MOBILITY SERVICES, S.L.
<b>Purposes of processing</b>	<ul style="list-style-type: none"> <li>• User's registration in App and management of the platform that supports the App.</li> <li>• Management of the App.</li> <li>• Centralized customer management and provision of the App Services.</li> <li>• Customer service.</li> <li>• Fraud prevention.</li> <li>• Management of promotions.</li> <li>• Data anonymization.</li> <li>• Data analysis (with external sources).</li> <li>• Marketing communications.</li> <li>• Third party marketing communications.</li> <li>• Profiling with internal sources.</li> <li>• Geolocation.</li> <li>• Compliance with legal obligations suitable to ZITY related to the App Services.</li> </ul>
<b>Categories of data</b>	Identifying and contact data; Personal characteristics; Social circumstances; Academic and professional data; Commercial information; Transactions of goods and services; Other categories of data; Data derived from the use of the service.
<b>Origin of the data</b>	<ul style="list-style-type: none"> <li>• Personal data provided by Users</li> <li>• Personal data obtained as a result of the use of the App by Users.</li> <li>• Local Operators.</li> <li>• Where appropriate, external sources understood as entities that are not ZITY.</li> </ul>

<b>Profiling</b>	<ul style="list-style-type: none"> <li>• For the purpose of sending Users personalised commercial communications adapted to their needs, preferences and personal circumstances.</li> <li>• For the purpose of performing analysis and data analytics operations in relation to user activity based on external sources.</li> </ul>
<b>Rights of data subjects</b>	Access, rectification, erasure, restriction of processing, opposition, portability, opposition to automated individual decisions and revocation of consent.
<b>Additional information</b>	Additional and detailed information regarding the processing of personal data is provided below.

## 2. ADDITIONAL INFORMATION ON DATA PROTECTION

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CARSHARING MOBILITY SERVICES, S.L. (hereinafter, "ZITY") makes the following Privacy Policy available to Users of the ZITY mobile application (hereinafter, the "App"), with the aim of providing information on how we process your personal data and protect your privacy. ZITY recommends that Users read our Privacy Policy carefully.

### Introduction

This Privacy Policy governs the processing of personal data collected by ZITY through the App, and/or in connection with the provision of the App Services (hereinafter "**App Services**"), as described in the [Lessor's Terms and Conditions](#). Vehicle leasing and carsharing services shall be provided by Local Operators (hereinafter "**Local Operators**") and may be subject to specific Terms and Conditions of Use and Privacy Policies.

The User guarantees that the information provided is true, accurate, complete and up-to-date, and is liable for any damages, direct or indirect, that may arise from failure to comply with this obligation. When the User provides personal data relating to third parties, he/she guarantees that he/she has informed them of the content of this Privacy Policy and that he/she has obtained their prior consent to provide us with their personal data or has another valid legitimate basis. Zity reserves the right to request documentary evidence of compliance with this obligation.

Zity may amend this Privacy Policy from time to time. In the event of a change to the Privacy Policy we will notify you via the App, our website or by any other means of communication to ensure that you are informed of the new privacy terms applicable to the ZITY'S Services. Your continued use of the Services after we have informed you of changes to our Privacy Policy will mean that you agree to the new terms, except in relation to possible data processing purposes where your consent is required.

### Who is the data controller of the personal data of the user?

Data controller: **CARSHARING MOBILITY SERVICES S.L.**

Registered tax number: **B87908513**

Registered Address: **C/ Francisco Sancha 42-44, 28034, Madrid (Spain)**

Contact address: **C/ Francisco Sancha 42-44, 28034, Madrid (Spain)**

Phone: **+34 91 150 11 18**

Email: [hola@zity.eco](mailto:hola@zity.eco)

Data Protection Officer (DPO): [dpo@zity.eco](mailto:dpo@zity.eco) or **C/ Francisco Sancha 42-44, 28034, Madrid (Spain)**

## For what purpose do we process the personal data of the user and with what lawful basis?

The personal data provided by the User may be processed by ZITY for any of the purposes listed below, depending on the type of data provided, the basis for legitimisation and the interactions that the User carries out through the App:

### 1. **User's registration in App and management of the platform that supports the App:**

- **Purpose:** The use of the App's services is conditional upon the User's prior registration in the App and, for some functionalities, the provision of the relevant and necessary documents together with the acceptance of the App's Terms and Conditions of Use and Privacy Policy.
- **Data processed for this purpose:** Identifying and contact data; Other categories of data.
- **Lawful basis for processing:** Performance of contract.

### 2. **Management of the App:**

- **Purpose:** The use of the App may involve the processing of certain technical information relating to the User's mobile device or other digital device, in order to enable the correct functioning of the App's Services as well as for the management of incidents.
- **Data processed for this purpose:** Identifying and contact data; Other categories of data; Data derived from the use of the service.
- **Lawful basis for processing:** Performance of contract.

### 3. **Centralized customer management and provision of the App Services:**

- **Purpose:** ZITY allows Users to make use of the carsharing services offered by Local Operators located in different geographies through centralised customer management.
- **Data processed for this purpose:** Identifying and contact data; Other categories of data; Data derived from the use of the service.
- **Lawful basis for processing:** Performance of contract.

### 4. **Customer service:**

- **Purpose:** ZITY provides Users with a customer service centre and service in relation to the use of the App Services.

- **Data processed for this purpose:** Identification and contact details; Data derived from the use of the service.
- **Lawful basis for processing:** Performance of contract.

#### 5. Fraud prevention:

- **Purpose:** Management and development of fraud prevention and control activities.
- **Data processed for this purpose:** Identifying and contact data; Social circumstances; Transactions of goods and services; Other categories of data; Data derived from the use of the service.
- **Lawful basis for processing:** ZITY's legitimate interest in not being a victim of fraud. You can request further information about how we have assessed our legitimate interest and your own interests by contacting us at [dpo@zity.eco](mailto:dpo@zity.eco).

#### 6. Management of promotions:

- **Purpose:** Management of promotions and User participation in them, including providing the User with information about the promotional activity in question and compliance with ZITY's legal obligations arising from the development of promotional activities.
- **Data processed for this purpose:** Identification and contact details; Data derived from the use of the service.
- **Lawful basis for processing:** Performance of established legal relationship.

#### 7. Data anonymization:

- **Purpose:** ZITY may carry out anonymisation operations in relation to Users' personal data in order to comply with legal obligations arising from the application of security measures and to prepare reports on the operation of the carsharing service, market research studies and profitability studies based on anonymised data, in order to increase knowledge about the use of ZITY services and to improve the App Services.
- **Data processed for this purpose:** Identifying and contact data; Personal characteristics; Social circumstances; Transactions of goods and services; Other categories of data; Data derived from the use of the service.
- **Lawful basis for processing:** ZITY's legitimate interest in being able to analyse the information it obtains as a result of providing the service in a way that does not require the processing of personal data, thereby minimising business risks. In addition, the conclusions derived from the studies in question serve to improve ZITY's business model. You can request further information on how we have assessed our legitimate interest and your own interests by contacting us at [dpo@zity.eco](mailto:dpo@zity.eco).

#### 8. Data analysis (with external sources):

- **Purpose:** Based on the consent of Users, ZITY may carry out data analysis operations in relation to User activity, with data from external sources, that is, entities different that ZITY, in order to develop predictive and mobility models.
- **Data processed for this purpose:** Identifying and contact data; Personal characteristics; Social

circumstances; Academic and professional data; Commercial information; Transactions of goods and services; Economic, financial and insurance data; Other categories of data; Data derived from the use of the service.

- **Lawful basis for processing:** Consent of data subject.

#### 9. Marketing communications:

- **Purpose:** ZITY may send its own commercial communications to Users in order to promote the use of the App and share content related to the App Services.
- **Data processed for this purpose:** Identification and contact details.
- **Lawful basis for processing:** ZITY's legitimate interest is to arouse interest and promote the purchase of our products and services, as well as to improve ZITY's image. You can request further information about how we have assessed our legitimate interest and your own interests by contacting us at [dpo@zity.eco](mailto:dpo@zity.eco).

#### 10. Third party marketing communications:

- **Purpose:** Based on the consent of Users, ZITY may send third party commercial communications to Users in order to promote third party products and/or services related to the following sectors of activity: manufacturing industry; electricity, gas, steam and air conditioning supply; wholesale and retail trade, repair of motor vehicles and motorbikes; transport and storage; hotels and restaurants; information and communications; financial and insurance activities; professional, scientific and technical activities; administrative and support services; health and social services; and artistic, recreational and entertainment activities.
- **Data processed for this purpose:** Identification and contact details.
- **Lawful basis for processing:** Consent of data subject.

#### 11. Profiling with internal sources:

- **Purpose:** In order to send Users personalised commercial communications adapted to the needs, preferences and personal circumstances, ZITY may collect information on the use of the App Services by a User, exclusively with internal data, as well as analyse the characteristics or behavioural patterns of the User, with the aim of predicting their behaviour in relation to the use of the App Services. Profiling with data from internal sources may include the execution of operations that allow the optimisation of the provision of the App Services and the improvement of the quality of the App Services and, as a consequence, users receive commercial communications of one type or another depending on such analysis.
- **Data processed for this purpose:** Identifying and contact data; Personal characteristics; Social circumstances; Transactions of goods and services; Other categories of data; Data derived from the use of the service.
- **Lawful basis for processing:** ZITY's legitimate interest in improving our commercial offering by offering our customers products and services adapted to their personal characteristics and preferences. In this sense, the consequence of this exercise is the offer of products and services adapted to what ZITY considers may be of interest to you. You can request additional information on how we have assessed our legitimate interest and your own interests by contacting us at [dpo@zity.eco](mailto:dpo@zity.eco).

#### 12. Geolocation:

- **Purpose:** In order to provide the App Services, as well as to facilitate the provision of carsharing services by Local Operators, ZITY may require the use of geolocation data from Users.
- **Data processed for this purpose:** Identifying and contact data; Other categories of data.
- **Lawful basis for processing:** Performance of contract.

#### 13. Compliance with legal obligations suitable to ZITY related to the App Services:

- **Purpose:** Fulfilment of ZITY's legal obligations in relation to the App Services, provided that the processing of User data is required for this purpose.
- **Data processed for this purpose:** Identifying and contact data; Social circumstances; Transactions of goods and services; Other categories of data; Data derived from the use of the service.
- **Lawful basis for processing** Compliance with legal obligations.

## From which sources does the personal data we process come?

ZITY obtains your personal data from the following sources:

- Personal data provided by Users through the forms made available by ZITY to allow User registration and use of the App and the App Services, as well as provided through any other form made available by ZITY.
- Personal data obtained as a result of the use of the App by Users.
- Personal data communicated by Local Operators necessary for the provision of carsharing services.

In particular, and without prejudice to the categories of data specified in the section "For what purposes do we process your personal data and with what lawful basis", we inform you that ZITY may receive personal data of the following types from Local Operators:

- **Identification and personal data** (e.g. name and surname, driver's licence, e-mail address, postal address, telephone number, IP address, etc.).
- **Data related to the use of carsharing services** (e.g. date and time of use of the carsharing service, incidents, etc.)
- **Other types of personal data**, which may be subject to the prior consent of Users (e.g. analytical data, biometric data, preferences, etc.)

## To whom are your personal data communicated?

We inform you that your data may be communicated to the following entities in accordance with the legitimate basis of the communication:

- For the purpose of the proper performance of the contractual relationship, we may communicate your data to:
  - Local Operators, to provide the carsharing vehicle leasing service and related services, such as invoicing.

- Insurance companies, for the management of claims and/or accidents.
- In order to comply with applicable legal obligations, we may disclose your data to:
  - Competent Public Administrations, for the fulfilment of tax obligations and for the identification of drivers in compliance with applicable regulations (if necessary), among other purposes.
  - To Judges, Courts or any other third parties to whom CAR SHARING MOBILITY SERVICES, S.L. may be obliged to communicate the information in the event of a challenge by the interested party or a claim of any kind.
- On the basis of our legitimate interest in ensuring the continuity of our business in the framework of commercial operations, we may disclose your data to:
  - Acquirers, successors or assigns of our business as part of any merger, acquisition, debt financing, sale of assets or similar transaction, or in the event of insolvency, bankruptcy or receivership in which the information is transferred to one or more third parties as one of the assets of our business.

ZITY is supported by various service providers who act under its responsibility and on behalf of ZITY as "data processors", such as Google Cloud. You can obtain more information about our data processors by contacting us at [dpo@zity.eco](mailto:dpo@zity.eco).

Likewise, we inform Users that the personal data provided to us is stored in the European Economic Area. Notwithstanding the foregoing, if for the provision of any particular service, such as the management of payments through the payment gateway, an international transfer of data is necessary, ZITY will cover such international transfer with one of the guarantees recognised under the applicable regulations, such as the signing of the standard contractual clauses approved by the European Commission. If the User wishes to obtain more information about data transfers, he/she may contact us by e-mail at the following address [dpo@zity.eco](mailto:dpo@zity.eco).

## For how long we keep your data?

The personal data provided will be kept for the period of time determined on the basis of the following criteria: (i) duration of the legal relationship and attention to any liabilities arising from such relationship; (ii) legal obligation of retention; and, (iii) request for deletion by the data subject in appropriate cases. You may request further information about the retention periods by contacting us at [dpo@zity.eco](mailto:dpo@zity.eco)

## What are your rights as data subject?

The Users have the right to **access** their personal data and obtain confirmation on how these data are being processed, as well as to request the **rectification** of inaccurate data or, where appropriate, request its **erasure** when, among other reasons, the data is no longer necessary for the purposes that were collected.

In certain circumstances, the user may request the **limitation of the processing** of their data, in which case we will only keep them for the exercise or defense of claims.

The Users also may **oppose** to the processing of their data and based on reasons related to their situation, in which case we will stop processing the personal data in question, except for compelling legitimate reasons or for the exercise or defense of claims.

The User can request the right to **data portability** and obtain for his or herself or for another service provider certain information derived from the relationship formalized with ZITY.

The User also has the right **not to be subject to a decision based solely on automated processing, including profiling,**

which produces legal effects concerning him or her or similarly significantly affects him or her.

Finally, the User can **withdraw his or her consent** at any time, in the case the consent has been granted for a specific purpose, without affecting the legality of the data processing based on the consent prior its withdrawal.

We remind the User that he/she can **object**, at any time, to the processing of his or her personal data with **commercial or promotional purposes**.

To exercise the described rights or revoke the consents given, the User can contact CARSHARING MOBILITY SERVICES, SL, User Service, C / Francisco Sancha, 42-44, 28034 of Madrid, indicating as reference "Data Protection" or by sending an email to the following email address: [hola@zity.eco](mailto:hola@zity.eco). We inform you that in order to make effective the exercised right, we may require you to provide additional documentation in order to prove your identity (for example a copy of your national ID card or passport).

For any additional information regarding processing of personal data, the User may contact the ZITY Data Protection Office ([dpo@zity.eco](mailto:dpo@zity.eco) o /C/ Francisco Sancha, 42-44, 28034 de Madrid). You can also submit a claim to the Spanish Data Protection Agency (<http://www.aepd.es>), especially when the User has not obtained satisfaction in the exercise of his/her rights.