

PRIVACY POLICY

Version dated 27/12/2017

RESPECT OF YOUR PRIVACY IS OUR CONCERN

We are fully aware of the importance of your privacy and we implement data protection rules seriously. Our main goal is to assure you smooth and safe online experience while using our Service, as defined in Drivy Terms and Conditions of Use as we are convinced that its success must be based on transparency and trust with our users.

We would, therefore, like to take this opportunity to give you a complete overview about our practices for the processing and protection of your Personal Data, as defined below.

As you use our Service we want you to know how we collect, store and process your Personal Data. We created this Privacy Policy for you to get all the information you need. We invite you to carefully read all the information we provide and if there are any questions left, please do not hesitate to contact us at any time.

You can notably send all inquiries about your Personal Data and how we use it directly to: privacy@drivy.com. We will promptly reply to you.

The Service

The service is provided by Drivy SAS, 35 rue Greneta, 75002, Paris/France, registered with the commercial register of Paris under 522 816 651 (“**Drivy**” or “**we/us/our**”).

Drivy provides an online platform intended to facilitate contact (hereinafter referred to as, the “**Service**” or “**Services**”) between, firstly, the individuals or legal entities who would like to rent out a car without a driver (“**Owner**”) and, secondly, the individuals who would like to rent a car for a short period of time as the main driver (“**Renter**”) (Owner and Renter hereinafter each and collectively also referred to as “**User**” or “**you/your**”). These Services are accessible via the Internet website through the following URLs www.drivy.com, www.drivy.de, www.drivy.es, www.drivy.at, www.drivy.be or www.drivy.co.uk (the “**Website**”) and/or as a mobile application entitled ‘Drivy’ (the “**App**”).

Each User may also use the services of Drivy Open and his/her Personal Data will be used as set forth below (“**Drivy Open**”).

The Services are described extensively in the Drivy Terms and Conditions.

Drivy is responsible for the processing of your Personal Data that are collected through your use of our Service and Website. This means that Drivy is notably in charge of their collection,

their safety and their use for the purposes that Drivy details in its privacy policy in compliance with the data protection rules. By using our Services and (where applicable) by registering as a User, you consent to such processing and you warrant the accuracy of all data provided by you.

What is Personal Data?

This is the first question you may ask.

To make it simple “**Personal Data**” covers any information relating to you as a natural person, such as your name, your address, your telephone number or your email address.

Personal data can also cover information allowing to identify you, directly or indirectly, in particular by reference to an identification number like an IP address.

What data does Drivy use?

Drivy collects and uses different set of data to provide you its Service and improve your experience on its Website. These data can be personal or not.

Server-Log-Files

Drivy uses log data that are automatically collected and stored by Drivy in so-called Server-Log-Files that your browser transfers to us.

Drivy will store these data through cookies for 13 months and will thereafter delete them.

App Data

Additionally, Drivy collects and stores the following data when you are using our App („**App Data**“):

User-ID, Android device ID or iOS IDFA, IP-address, country code, language, device name, name of the operating system and version, ...

Drivy uses these App Data only for statistical evaluation for the purpose of operating, security and optimizing the Services. Drivy hereby reserves the right to save and use these App Data afterwards if particular indications for an illegal use of rented cars and/or of our Services become apparent to us.

Sign-Up Data

To provide you with our Service, Drivy needs to collect some information about you.

When signing up for the Service and creating a user account, you submit the following information about your own Personal Data (“**Sign-Up Data**”):

Name and surname, email address, password, profile picture (optional), ...

Drivy will collect, process and use the Sign-Up Data for the purpose of providing the Service to each User.

Owner Data

In case you want to rent out your car to other users you additionally submit to the Sign-Up Data (or if applicable the Renter Data) the following information (“**Owner Data**”):

Car type and brand, details about the car (such as number of seats and doors), country and year of first registration, address of the parking location, telephone number, ...

Drivy will collect, process and use the Owner Data for the purpose of providing the Service to each User as Owner.

Renter Data

In case you want to rent any User’s car you additionally to the Sign-Up Data (or if applicable the Owner Data) submit the following information (“**Renter Data**”):

Number of driver’s license, first issuance date, country of issuance, date and place of birth, address (street, number, city and postal code), country of residence, telephone number, ...

Drivy will collect, process and use the Renter Data for the purpose of providing the Service to each User as Renter.

Payment Data

Additionally to your Sign-Up, Owner and/or Renter Data you additionally shall provide the following payment data for the purpose of making the car reservation and of receiving payments for the Service:

Bank account owner, IBAN, Drivy account password, ...

Drivy, through the services of the payment providers Stripe, PayPal or GoCardLess, will collect, process and use the Payment Data for the purpose of providing the Service and payment services to each User, being specified that part of the credit card number will be hashed during its display or storage. The Payment data will be processed by our payment provider according to the highest safety measures applicable in the e-commerce sector. Notably, the transaction will be made through secured and encrypted process according to the state of art.

Public Data

For the purpose of the use of the Service, Drivy will display certain of your Personal Data that you decide to make public on the Website and/or App (“**Public Data**”):

firstname and first letter of family name, full family name (optional), profile picture (optional), number of rentals and evaluation(s) by other users (if applicable), ...

Drivy will collect, process and use the Public Data for the purpose of providing the Service to each User and connecting the users to each other by displaying these data on the Website and/or App.

Drivy Open Data

Telematics boxes that Owners accept to be installed in their car(s) only collect and transmit to Drivy the User's data that are necessary for the provision of Drivy Open services.

From the moment the telematics box is activated in the respective car until this box is un-installed, Drivy will collect information related to the status of the car (*available, blocked, used by a Renter* ("**Status Car**")).

For the purpose of a car rental, Drivy will use and give access to the Renter to GPS/geolocation data of the car that will be collected within the framework of Drivy Open ("**Driver Data**") in the following cases only:

(i) 1h before the start of the rental to locate the car, (ii) in the event the Status Car is indicated as 'available' until a new rent is started and (iii) in case of non restitution of the vehicle.

When a car is not used by a Renter, the car's Owner can access GPS/geolocation data of his/her own car.

How long your Personal Data are stored?

We only keep your personal data for the period necessary for the performance of our Services and the duration of your membership. However your credit card details are kept for the time necessary for the completion of the transaction only, except if you agree that we store them longer and in a secure way in order to facilitate your future transactions for car reservations on our Website.

Log data are stored for 13 months for our statistical needs and are thereafter deleted.

How is our exclusion list managed?

In accordance with our Terms of Services and in order to guarantee the reliability and security of the operations carried out via the Services offered on our Site and our Application, Drivy sets up an exclusion list of Users in case of proven and verified fraud By our teams.

If you register on this list, the user's profile is blocked and no longer allows the User to use the Services offered by Drivy.

The following information shall be entered on the exclusion list: name, first name of the User concerned, number and date of expiry of the credit card used for the fraudulent transaction.

These data are kept for 2 years on an active basis and then archived for probatory purposes for 5 years. Drivy takes the necessary measures to ensure the security and confidentiality of the said data and has established a policy of restricted access to this data. At the end of these periods, the data are deleted.

The exclusion list includes the reasons for registration and is regularly updated. User profiles are deleted from the list of regularization of the incident that gave rise to the registration.

Users registered on this list may exercise their right of access, change, deletion or even opposition to appear on this list for legitimate reasons by sending their requests to privacy@drivy.com.

What happened to your Personal Data after membership termination?

Upon request from you (by writing to us at: Drivy SAS - 35, rue Greneta 75002 PARIS France) we will deactivate your account in a month and render your personal information unusable as soon as reasonably possible, in accordance with applicable law.

We do archive personal information from closed accounts in accordance with rules applicable to the protection of your data only in order to comply with legal obligations, prevent fraud, collect any fees remaining due, resolve disputes, troubleshoot problems, assist with any investigations, enforce our terms and conditions, and take other actions otherwise permitted by law.

Does Drivy share your data with third parties?

Drivy will only share your Personal Data with third parties if this is legally required and/or if Drivy has your express permission to do it.

Drivy is entitled to share Personal Data with its own service providers notably to carry out services and actions by order and for Drivy, like for example to let the software run on the platform of remote servers, carry out and settle up payment processes for offered products or services, carry out technical checks to validate on the Website the good condition of vehicles or outsource certain Customer Relation and Claim Management actions.

Drivy shall be entitled to process and use the User's log data that are automatically collected (Server Log-files) for the purpose of identifying, delimiting and removing malfunctions and errors in the telecommunication systems. If the requirements are met, Drivy may use log data that are necessary to uncover any unlawful use of the telecommunication systems and services. In accordance with prevailing legal provisions, Drivy may be required to provide information to criminal prosecution authorities and courts for prosecution purposes. In such

situation, Drivy may not inform you about the disclosure of your Personal Data to authorized third parties.

How does Drivy use Cookies ?

Drivy uses cookies and other tracking tools to offer you a convenient Service featuring numerous functions.

Cookies, pixels and tags (together “**Cookies**”) spare you the burden of entering data repeatedly, facilitate the transfer of specific content and the browsing on our webpages, help us to identify especially popular sections of our Service and save preferences like language settings. Among others, they enable us to tailor the content of the Service to your needs. Cookies are text files containing information to identify returning visitors exclusively for the time of their visit to the Service. Cookies are saved on the hard disk of your computer and/or mobile device.

When Drivy uses Cookies no personal identifying information will be collected.

How can you manage the setting of Cookies?

When you first visit our Website, a banner of information is displayed to ask you if you accept the setting of cookies that will be activated after your acceptance. This banner informs you that continuing your visit on our Website constitutes your agreement regarding the use of cookies, subject to consent, on your device.

You can also continue your browsing while refusing Cookies. For that, several options as described below are available to you. You can change your choices and settings at any time.

- For tracking cookies used for advertising purpose, you can also have access to a general platform allowing you to deactivate these cookies placed by ad or social networks via this <http://youonlinechoices.eu/>.
- You also have the ability to control and delete HTTP third cookies via your browser settings. Web browsers can use different methods to handle cookies. The instructions below are taken directly from developers of browsers to configure your browser settings.

[Microsoft Internet Explorer \(IE\)](#)

[Google Chrome](#)

[Safari](#)

Firefox

Please be aware that restricting certain cookies may affect the functionality of the Website and the quality of the Service.

What type of Cookies does Drivy use?

Drivy uses different categories of Cookies that you can freely handle.

Primary cookie for usage tracking

In order to improve Drivy's Service continuously, Drivy collects data for the use of the Service. Thereby Drivy investigates for example which content the Users view or which functions of the Service they use. These data are user-related collected, that means a so-called "User ID" is transferred, which allows to allocate the usage data to the Service being installed on your device. Drivy collects the "User ID", in order to be able to allocate the collected User browsing always to the same user. Drivy evaluates the data on a non identifying basis. Drivy may connect User data with personal user accounts in order to have the possibility to send them ,where appropriate, personalized offers.

The transfer of your data out of the Service is made via an encrypted connection.

When you log on to the Service with your personal user account it allows Drivy, to collect the related User data. You may revoke your consent for the setting and reading of such primary cookies at any time what will become effective for the future. For doing so, you send a notification to privacy@drivy.com. Of course you may activate this function there again at any time.

Analytic cookies for metrics

Drivy uses "**Google Analytics**", a service for the marketing analysis of this Service, of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("**Google**"). Google Analytics uses codes consisting of text and numbers, which will be stored on your device and which provides for an analysis of the use of the Service. The information generated by the Cookie about your use of the Service (including your IP address) will be transferred to and stored by a Google Server. Google will use this information, to evaluate your use of the Website, to prepare reports about the website activities for the website operators and to provide further services connected to the use of websites and the use of the Internet. Google may transfer this information to third parties, if legally obliged to do so or if third parties process these data on behalf of Google. In no case, Google will connect your IP address with other data from Google.

You can remove or deactivate such Cookies using the settings of your device; in such a case you might not be able to fully use all functions of our Website and/or App. By using our Service you agree to the processing of your Personal Data by Google to the extent and

purpose stated above. You can refuse to allow your data to be passed on by using a deactivation add-on for browsers under <https://tools.google.com/dlpage/gaoptout?hl=en>.

Please note that our Service uses Google Analytics with the extension '_anonymizeIp()' and consequently IP addresses are only used in shortened form in order to prevent direct personal references.

Advertising cookies for retargeting

- **Google AdWords Conversion, Google Dynamic Remarketing and Google Double Click**

Drivy uses “**Google AdWords Conversion**”, “**Google Dynamic Remarketing** » and « **Google Double Click** », services of advertising pixel for prospecting and retargeting by Google. They are tools that identifies if users have made specific actions on the platform after clicking on an Adwords ad.

It uses Cookies in order to be able to link an action to a user.

You can remove or deactivate such Cookies using the settings of your device; in such a case you might not be able to fully use all functions of our Website and/or App. By using our Service you agree to the processing of your Personal Data by Google to the extent and purpose stated above. You can refuse to allow your data to be passed on by using a deactivation add-on for browsers under *this* [link](#).

- **Facebook Pixel, Facebook Custom Audience**

Drivy uses “**Facebook Custom Audience**”, a service for advertising pixel for prospecting and retargeting operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA (“**Facebook**”). Facebook Custom Audience is a tool that identifies if Users have made specific actions on the platform after clicking or seeing a Facebook ad. It uses Cookies in order to be able to link an action to a user.

You can remove or deactivate such Cookies using the settings of your device; in such a case you might not be able to fully use all functions of our Website and/or App. By using our Service you agree to the processing of your data by Facebook to the extent and purpose stated above. You can refuse to allow your data to be passed on by using a deactivation add-on for browsers under this [link](#).

For information on the purpose and scope of the data collection and the further processing and utilization of the data by Facebook, as well as your rights in this respect and the settings that you can adjust to protect your privacy, please consult Facebook's data protection information: <http://www.facebook.com/policy.php>.

- **Twitter Advertising**

Drivy uses “**Twitter Advertising**”, a service of advertising pixel for prospecting and retargeting by Twitter Inc., 95 Folsom St., Suite 600, San Francisco, CA 94107, USA (“Twitter”). Twitter Advertising is a tool that identifies if users have made specific actions on the platform after clicking on a Twitter ad. It uses Cookies in order to be able to link an action to a user.

You can remove or deactivate such Cookies using the settings of your device; in such a case you might not be able to fully use all functions of our Website and/or App. By using our Service you agree to the processing of your data by Twitter to the extent and purpose stated above. You can refuse to allow your data to be passed on by using a deactivation add-on for browsers under this [link](#).

- **Vero**

Our Service uses the email transactions services provided by Invc.me Inc., 548 Market Street, San Francisco, CA 91104, USA (“**Vero**”). Vero provides us with a variety of tools and resources to enable us to collect User and usage data and to enable us as website and application owner to send email messages efficiently to users as consumers based on their behavior. Vero receives information about users, such as name and email address as well as actions on the Platform and collects, saves and uses these data for the purpose of sending specific emails according to the actions taken on the platform.

You can remove or deactivate such Cookies using the settings of your device; in such a case you might not be able to fully use all functions of our Website and/or App. By using our Service you agree to the processing of your data by Vero to the extent and purpose stated above. You can refuse to allow your data to be passed on by using a deactivation add-on for browsers under <https://allaboutdnt.com/>.

For information on the purpose and scope of the data collection and the further processing and utilization of the data by Vero, as well as your rights in this respect and the settings that you can adjust to protect your privacy, please consult Vero’s data protection information: <https://www.getvero.com/privacy/>.

How do we interact with Facebook ?

- **Plugins**

Our Service uses social plugins (“**Plugins**”) of Facebook. You can view the list of Facebook social plugins and see what they look like here: <http://www.developers.facebook.com/plugins>

If you click on a page of our Website that contains this sort of Plugin, your browser establishes a direct connection with the Facebook servers. Facebook directly transfers the Plugin content to your browser which embeds the latter into the Website. We cannot influence

the scope of data that Facebook collects with the help of this Plugin, meaning that the hereby information we provide is based on our current knowledge.

The embedding of the Plugin informs Facebook that you accessed the respective page of our Website. If you are logged into Facebook, Facebook can assign the visit to your Facebook account. If you interact with the Plugins on the Website and/or App, e.g. by clicking on the “Like” button or entering a comment, the corresponding information is transmitted from your browser directly to Facebook, where it will be saved. If you are not a member of Facebook, it is still possible for Facebook to identify and save your IP address.

For information on the purpose and scope of the data collection and the further processing and utilization of the data by Facebook, as well as your rights in this respect and the settings that you can adjust to protect your privacy, please consult Facebook's data protection information: <http://www.facebook.com/policy.php>.

If you are a member of Facebook and want to prevent Facebook from collecting data on you via our Website and linking this data to your member data stored with Facebook, you must log out of Facebook before you visit our Website.

- **Sign-In by using your Facebook account**

Alternatively to the process of signing in for the Service mentioned above, it is possible to sign-in to Drivy by using your Facebook account.

For this we use the function “Facebook Connect” offered by Facebook. When clicking the respective sign-in-button you will be redirected to Facebook, where you should log-in with your Facebook username and password. If you are already logged-into Facebook this step is not necessary. We will not collect or be aware of any of your data on Facebook at this point. After this step Facebook will inform you about the data transferred to us (public profile, friends’ list, email-address and current residence), which you will accept by clicking the respective ‘OK’-button. By using these transferred data we will create a user account, whereas the friends’ list will not be saved by us. There will be no further connection or transfer between your Facebook account and your user account.

For information on the purpose and scope of the data collection and the further processing and utilization of the data by Facebook, as well as your rights in this respect and the settings that you can adjust to protect your privacy, please consult Facebook's data protection information: <http://www.facebook.com/policy.php>.

- **Sign-In by using your Google account**

Alternatively to the process of signing in for the Service mentioned above, it is possible to sign-in to Drivy by using your Google account.

For this we use the function “Google Connect” offered by Google. When clicking the respective sign-in-button you will be redirected to Google, where you should log-in with your Google username and password. If you are already logged-into Google this step is not necessary. We will not collect or be aware of any of your data on Google at this point. After this step Google will inform you about the data transferred to us (public profile, friends’ list, email-address and current residence), which you will accept by clicking the respective ‘OK’-button. By using these transferred data we will create a user account, whereas the friends’ list will not be saved by us. There will be no further connection or transfer between your Google account and your user account.

For information on the purpose and scope of the data collection and the further processing and utilization of the data by Google, as well as your rights in this respect and the settings that you can adjust to protect your privacy, please consult Google’s data protection information: <https://www.google.com/policies/privacy/>.

What data security measures do we implement?

We employ efficient technical and organizational measures in order to safeguard the Service and other systems against loss, destruction, access, changes or the distribution of your data by unauthorized persons according to current the state of art. The data transfer between the Service and the Server is [SSL] encrypted.

The access to your Drivy account is possible only after entering your personal password directly or through autologin processes or through Facebook Connect. You should always treat your access information confidentially and close the browser window, once you have ended your communication with us, particularly if you share the use of the computer and/or device with others.

Drivy will store your data on servers, which are located in North America and managed by Amazon Web Services, Inc., (« **Amazon** »), which participates in the EU-US Privacy Shield framework regarding the collection, use, and retention of personal information from European Union member countries and has also signed the standard contractual clauses approved by the EU commission for the transfer of personal data outside EU.

Pursuant to the European regulation, the law applicable to the protection of the personal data is the one of the EU country where the data controller is established. As Drivy is based in France, the French Data Protection Act (*Loi Informatique et Libertés*) will govern the processing of personal information we collect.

If you have any queries about the security of our Service, please do not hesitate to contact us at any time at privacy@drivy.com.

How we use and moderate your messages ?

Drivy might read the messages exchanged through the Website or the App between members for fraud prevention purposes, to improve the Service, for user support purposes or verification of respect by our users of our Terms and Conditions. For example, to avoid that a member bypasses our online booking system, Drivy automatically monitors and analyzes the messages exchanged on our platform to ensure they do not contain any reference to or words linked to another way of booking.

As often as possible, we use automated systems to process moderating the messages sent between members via the Website or the App.

We will never read any communication between members of our community for promotional or advertising targeting.

How you can exercise your privacy rights?

You have the right to revoke the consents you gave us to collect, store, process and share your Personal Data at any time. Please be aware, that any revocation of consent is effective only for future collecting, storing, processing or sharing of your Personal Data.

The French Data Protection Act also guarantees you rights to have access to , modify or delete your Personal Data. Upon request, Drivy shall provide you with the information on the stored data relating to your person, free of charge. The information can be provided electronically, if desired. In cases regulated by law we are obliged, upon request, to correct, block or delete the data stored about you.

Please direct all requests directly to: privacy@drivy.com.

For your own security, please understand that in the event of a request for information or a change we have to verify your identity.

Can we change the Privacy Policy?

Drivy reserves the right to change this Privacy Policy at any time, taking into account currently applicable data protection provisions. In case of any changes, you will be notified upon log-on to our Service through the Website and/or App and you will have the right to object according to the provisions as set forth in the terms of use.

Who is your privacy contact?

If you have any further questions about the collection, use and processing of your Personal Data, please contact us directly at:

Drivy 35, rue Greneta 75002 PARIS, France

or use privacy@drivy.com