

## SNAPPCAR - PRIVACY POLICY

SnappCar takes your privacy very seriously and will treat all your personal information with the utmost care. SnappCar will always act in accordance with the General Data Protection Regulation (“GDPR”). This document sets out SnappCar’s privacy policy for the use of SnappCar’s services. We recommend that you read this privacy policy carefully. If you have any questions or would like more information on this topic, please do not hesitate to contact us via [Privacy@snappcar.nl](mailto:Privacy@snappcar.nl).

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### 1. What is SnappCar and how do I contact SnappCar?

SnappCar manages an online platform and community market place that facilitates the renting of vehicles between persons on its websites [www.snappcar.nl](http://www.snappcar.nl), [www.snappcar.de](http://www.snappcar.de), [www.snappcar.se](http://www.snappcar.se), [www.snappcar.com](http://www.snappcar.com) (collectively “the Website”) and the SnappCar app (“the App”). In order to offer and provide its services, SnappCar processes certain personal data as described in this privacy policy.

The party responsible for the processing of personal data is SnappCar, a trade name of Carshare Ventures B.V., which has its registered office at Jaarbeursplein 6 in (3521 AL) Utrecht, the Netherlands (“SnappCar”).

CarShare Ventures B.V. functions as the data controller within the SnappCar Group, which comprises CarShare Ventures B.V. (the parent company) and local subsidiaries CarShare Duitsland GmbH and Flexidrive Sverige AB. As such, it determines the goal and the means of all data processing and acts as the responsible party under whose authority the operational data processing takes place.

All questions concerning the processing of personal data by SnappCar can be directed to [Privacy@SnappCar.nl](mailto:Privacy@SnappCar.nl) or by regular post to Jaarbeursplein 6, 3521 AL Utrecht, the Netherlands.

If you have any questions or requests in connection with your personal data, you can also contact our data protection officer:

Name : Lora Mourcous, e-mail: [DPO@snappcar.nl](mailto:DPO@snappcar.nl)

Address : SnappCar, attn. DPO, Jaarbeursplein 6, 3521 AL Utrecht, Netherlands

## **2. What personal data does SnappCar process, for what reason and on what legal basis?**

### Creating an account

In order to make use of the SnappCar service, you have to create a personal account. When creating an account, you must provide certain information about yourself:

- Your contact details (forename, middle name, surname, e-mail, full address, mobile telephone number, date and country of birth) are required to create an account with SnappCar (“**Contact Details**”).
- You can voluntarily add additional personal data to your Contact Details, such as gender, profile picture, images, biography (“about me”) and links to social media (such as Facebook, LinkedIn and Twitter) (“**Additional Information**”).
- You can also decide to create an account using your Facebook account. In that case, SnappCar will process the following data from your Facebook account: information on your public Facebook profile (name, profile picture, age group, gender, language, country and other specific public information), your Facebook friend lists and your e-mail address (“**Facebook Data**”). If you decide to register using your Facebook account, SnappCar will process the Facebook Data as Contact Details.

SnappCar has to process these personal data to create your account and ensure that you can use the Website and/or App. The processing of your personal data in this context is necessary for the performance of any agreement concerning the use of the Website and/or App to which you are a party (Article 6(1)(b) GDPR).

### Making reservations

In order to rent a vehicle on the SnappCar Platform, you must provide your Contact Details, a copy of your driving licence, and payment details (such as an IBAN account number and the name of the account holder and/or your credit card details).

These personal data are required to make a reservation with SnappCar, to check whether you meet the requirements (such as a valid driving licence, your identity and age group if indicated by the owner) and to process payments (“**Reservation Data**”).

**Cover your passport photo and citizen service number before uploading a copy of your driving licence, passport or identity card.**

The processing of your personal data in this context is necessary for the performance of any agreement concerning the use of the Website and/or App to which you are or will become a party (Article 6(1)(b) GDPR).

#### Offering a vehicle for rental

In order to offer a vehicle for rent via the SnappCar Platform, you must provide your Contact Details, a copy of your identity card, driving licence or passport (**cover your passport photo and citizen service number before uploading a copy**), the availability of your vehicle, your vehicle's registration number and non-personal information about the vehicle.

SnappCar requests and processes this information to enable you to offer your vehicle for rent via SnappCar and to show the availability and location of your car or vehicle ("**Car Details**"). SnappCar also uses the Car Details to check whether your car or vehicle has been correctly registered to your SnappCar account and is not listed as stolen or missing, and to verify your identity and the ownership of the vehicle. Payment details (such as bank details, account number, name of your bank and the name of the account holder as stated on the bank card) are also required to process payments.

The processing of your personal data in this context is necessary for the performance of any agreement with SnappCar concerning the use of the Website and/or App to which you are a party (Article 6(1)(b) GDPR).

#### Concluding a rental agreement

The contact details of the renter and the owner, the vehicle's registration number and its geolocation ("**Rental Details**") are required to conclude a rental contract and to ensure that the insurance company offers the insured cover.

Note: to ensure that the insurance company offers insured cover, SnappCar will forward the Car Details and Rental Details to its insurance company; see <https://www.snappcar.nl/verzekering> for the contact details of the insurance company. The data transfer to the insurance company is required to create insured cover between you and the insurance company, to check whether you meet the requirements and whether the vehicle is listed as stolen or missing, and to verify your identity and the ownership of the vehicle. The processing of your personal data in this context is necessary for the performance of the agreement with the insurance company to which you are a party.

If requested by the insurance company, SnappCar will provide your Contact Details, Reservation Data and Rental Details in the event of theft or suspected fraud. The processing of these personal data is necessary for the purposes of the legitimate interests pursued by SnappCar and the insurance company, namely to prevent and detect fraud.

Moreover, SnappCar shares the following information between the renter and the owner: your Contact Details, the Reservation Data, the rental agreement, the Rental Details and the driving licence number of the renter (to verify your identity). The processing of these personal data is necessary for the purposes of the legitimate interests pursued by SnappCar (Article 6(1)(f) GDPR), namely to enable the rent of the vehicle and communication between renters and owners.

Electronic communication between renters and owners can be sent via SnappCar's servers or can be sent by SnappCar to service providers to provide the services to you.

#### Detecting fraud

In order to prevent fraud and abuse and combat fraudsters, scammers and other criminals, SnappCar profiles your personal data, such as your activity on your account, payment preferences, online account preferences, payment details and history, contract term, services provided, contact history, website visits and log-in behaviour, to detect fraud. Profiling refers to any form of automated processing of your personal information to assess certain personal aspects about you, such as analysing or predicting aspects relating to your economic situation, health, personal preferences, interests, trustworthiness, conduct, location or movements.

SnappCar may detect when your account is being used in a manner similar to that used by fraudsters. Or SnappCar may notice when your account is being used in a way that is unusual for you. If SnappCar believes there to be a risk of fraud, SnappCar may suspend activity on your account or deny access to your account in accordance with the general terms and conditions. Note: if, based on the profiling, we detect or have reason to suspect that you are involved in fraud, scams or criminal activities, we will process your personal data in such a way as to prevent you from using our service in the future. In that case, SnappCar may also forward your data to the competent authorities.

The profiling and processing of your personal data is necessary for the purposes of the legitimate interests pursued by SnappCar (Article 6(1)(f) GDPR), namely to prevent and detect fraud.

#### Monitoring hiring and rental behaviour

In order to allow renters and users to check your rental conduct, SnappCar generates these data (assessments, user experiences, rental details and frequency) on the basis of your reservations and may add these data to your profile, which is visible on the Website to all visitors. The processing of these personal data is necessary for the purposes of the legitimate interests pursued by SnappCar (Article 6(1)(f) GDPR), namely to increase the reliability of the service.

#### Providing customer service

In order to provide international customer service, we may collect and share your personal data (Contact Details, Reservation Data, Car Details and Rental Details) to answer your questions or help you with issues that might occur in connection with your reservation(s), rent or the service. When using the online chat functionality, the data processed by SnappCar for this purpose include the browser details and the information entered by you in the contact form or provided in a chat with SnappCar. The processing of these personal data is necessary for the purposes of the legitimate interests pursued by SnappCar (Article 6(1)(f) GDPR), namely to help you efficiently and to optimise SnappCar's customer service.

#### SnappCar Keyless (keyless rental)

In order to allow for keyless rental, SnappCar collects the geolocation data of the vehicle. SnappCar requests and processes this information so that you can offer your vehicle for

keyless rental via SnappCar and so that the renter can see the location of your vehicle. SnappCar may also store information from the log file, such as events, status, location and speed, for fraud detection and prevention.

If you are the renter, the processing of these personal data is necessary for the purposes of the legitimate interests pursued by SnappCar (Article 6(1)(f) GDPR), namely to allow for keyless rental of the vehicle between renters and owners, determine the location of the vehicle, and detect and prevent fraud.

With regard to owners, the processing of the aforementioned information is based on the consent (Article 6(1)(a) GDPR) given by the owners when they enter into a SnappCar Keyless Agreement to have the keyless equipment installed in their vehicle. Owners may withdraw this consent only by unsubscribing from the SnappCar Keyless programme and having the Keyless technology removed from their car.

The personal data processed specifically in the context of the SnappCar Keyless programme may be shared with service providers (such as the supplier of the Keyless technology) and the installation partner.

#### SnappCar private lease

SnappCar offers various private lease options in cooperation with leasing companies. If on our Website you indicate an interest in SnappCar private lease, we will share you contact details with the leasing company so that they can approach you to provide additional information, finalise a possible order and coordinate the delivery of the car. The processing of your personal data in this context is based on your consent or necessary in the context of the performance of your private lease contract or the taking of precontractual measures (Article 6(1)(a) and/or (b) GDPR).

As from when you are actually using SnappCar private lease, we will share your vehicle registration number with the leasing company to allow for monthly invoicing where necessary and we will share various data with the leasing company to carry out operational tasks (such as claims adjusting or coordinating the return of the car). The processing of these personal data is necessary in the context of the performance of your private lease contract (Article 6(1)(b) GDPR) or necessary for the purposes of the legitimate interests pursued by SnappCar (Article 6(1)(f) GDPR), namely to facilitate and improve the provision of services to users.

#### Information notices

In order for us to be able to send you the information notices (not marketing communication) required to provide the services (such as push notifications, system notifications, e-mail notifications and text messages received by an owners if a renter is interested in a vehicle, or a message when a reservation has not been completed), we may use your mobile telephone number and/or e-mail address. SnappCar may also send you information relating to a reservation and a questionnaire or assessment form after you have made a reservation. The processing of your personal data for this purpose is necessary for the purposes of the legitimate interests pursued by SnappCar (Article 6(1)(f) GDPR), namely to provide users with sufficient information concerning their use of the service and to improve the service further to assessments.

## Communication and assessments

In order to allow you to communicate with other registered users and upload reviews and experiences, SnappCar may process your name, car details, profile picture and reviews. SnappCar may post user experiences containing personal data of users on its Website. The processing of these personal data is necessary for the purposes of the legitimate interests pursued by SnappCar, namely to increase the reliability of the service and allow for communication between users.

### E-mails

#### *Newsletter*

SnappCar would like to keep you informed of developments in its products and services. Consequently, SnappCar will inform you when the service changes or is updated, but only if you have subscribed to SnappCar's newsletters. SnappCar may also send you personalised newsletters depending on your actual address, your activity and conduct on your account, and whether you are a renter or an owner, among other things. For example, if you are a renter, SnappCar's newsletter may contain tips that allow you to rent your car in time if you live in a city where SnappCar expects an increase in rental activity.

To the extent required, the registration uses a double opt-in process. Following the registration on our Website, you will receive a confirmation e-mail asking you to confirm your registration. This entire process will be documented and stored by SnappCar. This includes the time and confirmation of your registration and your IP address.

If at any point you no longer wish to receive e-mails from SnappCar, you can change the settings in your account. Each e-mail sent to you by SnappCar also includes an option to unsubscribe.

You must provide your e-mail address to be able to register with us. The processing of these personal data is necessary for the purposes of the legitimate interests pursued by SnappCar (Article 6(1)(f) GDPR), namely direct marketing.

#### *Marketing e-mails*

You can subscribe to our marketing e-mails. Our marketing e-mails can contain information on new offers, SnappCar services or products and services of other partners, etc. You must provide your e-mail address to be able to subscribe. Other information that is used to optimise the marketing e-mail may be provided voluntarily. SnappCar may also send you personalised marketing e-mails depending on your actual address, your activity and conduct on your account, and whether you are a renter or an owner, among other things. For example, if your car needs a periodic vehicle inspection (APK), SnappCar may send you a marketing e-mail containing an offer from a partner providing periodic vehicle inspections. By subscribing to our marketing e-mails, you agree to receive advertisements. The e-mail address used to subscribe will be used exclusively to send you our marketing e-mails, unless you have given us consent to use your e-mail address for other purposes. You may withdraw your consent to receive our marketing e-mails at any time. In order to unsubscribe, please use the link given in our e-mails; you may also change the settings in your account. The processing of these

personal data is necessary for the purposes of the legitimate interests pursued by SnappCar (Article 6(1)(f) GDPR), namely direct marketing.

### *E-mail tracking*

SnappCar has incorporated e-mail tracking and link tracking functionality in its e-mails by including a small, transparent pixel in the outgoing e-mail. As soon as the e-mail is opened, SnappCar can access certain information, such as the name and surname of the recipient; the e-mail address of the recipient; the subject of the e-mail; the date and time at which the e-mail was sent; confirmation that the recipient has received the e-mail; confirmation that the recipient has opened the e-mail after receipt; the timestamp each time the e-mail is opened; the history of the number of times (number, date and time) the recipient has opened the received e-mail; the IP from which the e-mail was opened; the browser and operating system used by the recipient who opened the e-mail; the number of links contained in the e-mail; the text and URLs of those links; the number of times the recipient clicks each of these links; the timestamp of each click on the link; the IP from which the link was clicked and the browser and operating system used by the person who clicked the link.

The processing of these personal data is necessary for the purposes of the legitimate interests pursued by SnappCar (Article 6(1)(f) GDPR), namely to analyse the reach and effectiveness of the e-mails sent by SnappCar.

### Push notifications

When you use our App or Website on a device that can receive push notifications, you can give permission to receive push notifications. We use the Apple Push Notification Service (iOS version) of Apple Inc., 1 Infinite Loop, Cupertino, CA 95014 (“Apple push notification”) or Google Cloud Messaging (Android version) of Google Inc. (www.google.de), 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (“Google push notification”).

Apple and Google push notifications may give you updates about, for example, the status of your reservations or other useful notifications. In order to send push notifications to your device, we send data (for example the notification that you have a new message in your App’s mailbox) to Apple and Google’s server, which they then encrypt and forward to your App and your device. To ensure a secure transmission of your notification to your device, we send your device ID token to Apple and Google. A device ID token is a separate connection key generated on the basis of your device ID.

Your data are processed only with your consent (Article 6(1)(a) GDPR). You may withdraw your permission for receiving push notifications at any time. In order to withdraw your permission, you may turn off these notifications at any time by changing the notification settings in your account or your device settings, or by removing the SnappCar App from your device.

Please read the privacy policy of Apple and Google for more information about data protection during this process.

### Marketing

Advertising is only effective when the advertisements are relevant to you. That is why SnappCar may use your personal data to create customer profiles and show personalised advertisements within and beyond SnappCar's Website. SnappCar may show personalised offers, including third-party offers, based on the information you share with us. We will not forward the data to our partners, but our partners can see when you click the partner link on our Website. The processing of your data is based exclusively on your consent (Article 6(1)(a) GDPR). You have the right to object to profiling and you may withdraw your consent to receive personalised advertisements at any time using the contact details given in Chapter 4.

#### Custom Audience (Facebook)

SnappCar may participate in Facebook's Custom Audience programme, whereby SnappCar may show personalised advertisements to persons on the SnappCar e-mail lists when they visit Facebook.com. SnappCar will provide personal information such as your name, place of residence, postcode, e-mail address and telephone number to Facebook so that Facebook can determine whether you have a registered account on Facebook. You can opt out of SnappCar's Facebook Custom Audience by sending an e-mail from the e-mail address you wish to opt out for to the e-mail address stated in our contact details below. In order to confirm your opt-out, you must: (i) use the following text in the subject line of the e-mail - "Opting Out of Facebook Custom Audience Ads", and (ii) state your name and e-mail address in the main body of the e-mail. We will send your name and e-mail address to Facebook.com with the request to remove you from all our Facebook Custom Audience Ads.

The processing of your data in order to show personalised advertisements to persons on the SnappCar e-mail lists when they visit Facebook is based exclusively on your consent (Article 6(1)(a) GDPR).

#### Merging of data

In order to keep the processing of personal data to a minimum, SnappCar may merge or encrypt your personal data to generate anonymous data that cannot be traced back to a natural person. The processing of these personal data is necessary for the purposes of the legitimate interests pursued by SnappCar (Article 6(1)(f) GDPR), namely to comply with privacy legislation and to protect your privacy.

#### Automatically generated data (log files)

SnappCar collects automatically generated data on your use of the Website. This information consists of your IP address (a unique number that makes it possible to identify your device); account activity (such as use of storage space, number of log-ins); data shown or clicked (such as UI elements, links); and other logged information (such as browser, IP address, date and time of access, cookie ID, and URL referrer). SnappCar needs this information to ensure that the Website functions optimally (for example to show the content correctly and keep the Website secure); the processing of these personal data is therefore necessary for the purposes of the legitimate interests pursued by SnappCar (Article 6(1)(f) GDPR).

#### Complying with national legislation

In order to comply with applicable legislation, SnappCar may be required to process all your personal data for purposes other than those set out in this privacy policy, such as law



enforcement and compliance with court orders. The processing of your personal data in this context is necessary to comply with SnappCar's legal obligations (Article 6(1)(c) GDPR).

### 3. In what cases would SnappCar disclose my personal data to third parties?

Under certain circumstances, SnappCar may share your personal data with third parties:

- In order to complete the reservation, SnappCar must share the relevant reservation data between the **renter** and the **owner**. This may include data such as your Contact Details.
- In order to allow for the provision of the services, SnappCar shares your personal data with **service providers** (processors). These service providers will process your personal data on behalf of SnappCar. The processing by service providers is subject to a processing agreement by which SnappCar has ensured that the service provider will process the personal data only on the instructions of SnappCar. Some of these service providers are based outside of the European Economic Area (EEA), namely in the United States of America. In order to comply with EU legislation on data protection in the event of international data transfers, SnappCar allows service providers outside of the EEA to process your personal data only if SnappCar and the service provider have concluded a contract containing the model contract clauses laid down by the European Commission, thereby ensuring that appropriate data protection safeguards are in place (Article 46(1)(c) GDPR).
- Examples of service providers with which SnappCar shares data for the purposes of the legitimate interests pursued by SnappCar, namely to provide the services to you, are:

- **Stripe:** We process payments via the payment service provider Stripe Payments Europe Ltd, 1 Grand Canal Street Lower, Dublin 2, Ireland ("**Stripe**"): a payment processing company based in Ireland. SnappCar has instructed Stripe to process all payments on our Website. That is why we transfer your payment details (i.e. name, address, IBAN account number and name of account holder and/or credit card details) to Stripe. Stripe is allowed to use these data to process the payments and share the payment information with SnappCar. Stripe acts as data processor on behalf of SnappCar.

- **Zendesk:** We process customer questions via the Zendesk ticket system, a customer service platform provided by Zendesk Inc., 989 Market Street #300, San Francisco, CA 94102 ("Zendesk"). All required data (such as name, surname, address, telephone number, e-mail address) are registered via our Website to answer your question. Please see the [privacy policy](#) of Zendesk for more information about data protection during this process. The processing of these personal data is necessary for the purposes of the legitimate interests pursued by SnappCar, namely to provide customer service to you.

- **customer.io:** We use the customer.io service provided by Peaberry Software Inc., 921 SW Washington St, Suite #820, Portland, OR 97205, USA ("customer.io") on our Website. Customer.io sends e-mails to our registered customers on our behalf. In order to use customer.io, a cookie is placed on your computer and your browser connects directly to the customer.io server. The cookie tracks your activities on our Website and sends you notifications based on your activities. Customer.io also provides statistical analyses of usage data by identifying users. That is why customer.io processes information (for example

whether an e-mail has been received or refused by the server). Please see the data protection policy of customer.io for more information about data protection during this process.

- **Sift Science** : We use the Sift Science analysis tool provided by Sift Science Inc., 123 Mission St. 2000, San Francisco CA 94105 (“Sift Science”) on our Website. Sift Science analyses your e-mail address, invoice address, delivery address, username, telephone number, IP address, user conduct on our Website, reservation details, and payment details, such as the amount of the invoice, payment method and credit card number, to prevent fraud and fraudulent conduct on our Website. Please see the [privacy policy](#) of Sift Science for more information about data protection during this process. The processing of these personal data is necessary for the purposes of the legitimate interests pursued by SnappCar (Article 6(1)(f) GDPR), namely to detect and prevent fraud.
- **RentalCheck** : We use the RentalCheck service provided by CrimiMail B.V., Hanzeweg 12a, 2803 MC Gouda, the Netherlands (“RentalCheck”) on our Website to verify identity documents. In order to provide the service to you, RentalCheck collects and processes your identity documents and examines the probability that the document provided is authentic and, if applicable, compares the information in the document with the verified identity. The processing of these personal data is necessary for the purposes of the legitimate interests pursued by SnappCar (Article 6(1)(f) GDPR), namely to verify identity documents and thereby guarantee the reliability of the service.
- To ensure that the **insurance company** offers insured cover, SnappCar will forward the Car Details and Rental Details to its insurance company; see <https://www.snappcar.de/versicherung>, <https://www.snappcar.nl/verzekering>, <https://www.snappcar.se/forsakring> for the contact details of the insurance company. The data transfer to the insurance company is required to create insured cover between you and the insurance company, to check whether you meet the requirements and whether the vehicle is listed as stolen or missing, and to verify your identity and the ownership of the vehicle. The processing of your personal data in this context is necessary for the performance of any agreement with the insurance company to which you are a party (Article 6(1)(e) GDPR).
- **Social Plug-Ins** : We use a number of social plug-ins on our Website. We do not collect any personal data ourselves. In order to prevent data from being forwarded to service providers in the USA without your knowledge, we use the Shariff solution. The Shariff solution prevents personal data from being sent to a social plug-in initially when you visit our Website. Data may be forwarded and stored only when you click a social plug-in. When you visit our Website, your browser connects directly to the relevant server of the social network. The contents of the plug-in are sent directly from the relevant social network to your browser and from there to our Website. We therefore have no control over the amount of data collected by the relevant social network through its plug-in. We therefore inform you that, as far as we know, the relevant social network will in any event receive the information that you visited our Website. If you use the plug-in, the relevant information (such as the use of the Like or Share button) will be forwarded and stored by the social network.

If you are logged into your personal social network account while you visit our Website, the social network will be able to link your visit to your account. If you do not want this link to be made, you must log out of your social network and delete your cookies before you visit our Website. You can usually also withdraw your consent to use your data for advertising

purposes in the account settings of the social network. If you are not a member of a social network, social networks may still store your IP address. We use the plug-ins of the following social networks:

- Facebook

- Twitter

- Google+ / YouTube

- LinkedIn

- Bing

- **Social Media** : Aside from our Website, we are also active on a number of social networks. If you visit us there, your personal data may be forwarded to the relevant social network. It is possible that the data you entered specifically in the social network, as well as other information, are collected, analysed and used by the provider of that social network. It is also possible that the provider of the social network collects and processes the most important information on the computer system you use to visit the social network (such as your IP address, the type of processor used and your browser version, including all plug-ins).

If you are logged into your personal social network account while you visit our social media pages, the social network will be able to link your visit to your account. If you do not want this link to be made, you must log out of your social network and delete your cookies before you visit our social media pages.

Please see the privacy policy of the relevant social network for more information about data protection during this process.

- [Facebook](#)

- [Twitter](#)

- [Google+](#) / [YouTube](#)

- [LinkedIn](#)

- [Bing](#)

- **Third-party content** : Our Website also contains third-party content (such as YouTube videos, maps from Google Maps, RSS feeds or images from other websites). In order to be able to show you this third-party content, we send your IP address to the relevant third parties. We cannot control whether a third party will use your IP address only to show you their content or whether they will also collect and store your IP address for other purposes. If we gain knowledge of such conduct, we will inform you of this through our data protection policy. The processing of these personal data is necessary for the purposes of the legitimate interests pursued by SnappCar, namely to show third-party content.

- **Competent authorities** : To the extent prescribed by law or strictly necessary for the prevention, detection or prosecution of punishable acts and fraud, SnappCar will disclose personal data to law enforcement officers and other government bodies. The processing of your personal data in this context is necessary to comply with SnappCar's legal obligations.
- **Mergers and Acquisitions** : SnappCar may transfer your personal data to third parties in the event of a merger, acquisition, reorganisation, sale of assets, bankruptcy or insolvency of SnappCar. If required by the applicable legislation, SnappCar will ensure that you are asked for permission in advance. The processing of these personal data in this context is necessary for the purposes of the legitimate interests pursued by SnappCar.

Please contact SnappCar via [privacy@snappcar.nl](mailto:privacy@snappcar.nl) if you have any questions about the transfer of your data to third parties.

#### 4. What are my rights?

You have a number of rights relating to your personal data and their processing under the GDPR:

- You have the right to have SnappCar confirm whether or not your personal data are being processed, and, if that is the case, you have the right to access your personal data and additional information on the processing of your personal data;
- You have the right to have SnappCar rectify inaccurate personal data;
- In some cases, you have the right to have SnappCar erase your personal data (the right to be forgotten);
- In some cases, you have the right to have SnappCar restrict the processing of your personal data, for example if you have contested the accuracy of your personal data;
- You have the right to receive upon request your personal data which you have provided to SnappCar, in a structured, commonly used and machine-readable format, and you have the right to transfer those data to another controller where the processing is based on your consent or on a contract;
- You have the right to object to the processing of personal data on the basis of the legitimate interests pursued by SnappCar. In that case, SnappCar will no longer process the personal data unless SnappCar demonstrates compelling legitimate grounds for the processing that outweigh your interests, rights and freedoms or that relate to the establishment, exercise or defence of legal claims;
- Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such marketing. In that case, SnappCar will no longer process your personal data for such purposes;
- Where the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. The withdrawal of consent will not affect the legitimacy of processing based on consent before it was withdrawn.

You can submit your request to SnappCar via [Privacy@snappcar.nl](mailto:Privacy@snappcar.nl). SnappCar will respond to your request as soon as possible, but in any event within 30 days after receipt of the request. This period may be extended by two months, depending on the complexity and number of the requests. SnappCar will inform you within 30 days after receipt of the request whether such an extension will be applied, stating the reason for the delay.

If SnappCar takes no action further to your request, SnappCar will inform you as soon as possible, but in any event within 30 days after receipt of the request, of the reasons why it is taking no action. In that case, you also have the right to file a complaint with the supervisory authority and to appeal to the courts.

## **5. How do I deregister from SnappCar and what happens to my personal data when I do?**

You can deregister as a user of SnappCar's services by sending an e-mail to [Privacy@snappcar.nl](mailto:Privacy@snappcar.nl) in which you state your wish to deregister or by completing the contact form on the Website. SnappCar will process such requests as soon as possible, but within 4 weeks after receipt, or a different term as required by the applicable legislation.

Your personal data will be kept as long as you continue to use SnappCar. As soon as you deregister, the retention periods listed in section 6 below commence. This means that your contact details, for example, will be deleted no later than two years after deregistration.

Some personal data will be kept for a longer period after deregistration, such as your rental history, as stated below in the section on data retention.

## **6. How long does SnappCar keep my personal data?**

<b>Type of personal data</b>	<b>Retention period</b>
Contact details	10 years after deregistration
Copy of driving licence (excl. photo and citizen service number)	2 years after deregistration
Extra profile information	2 years after deregistration
Facebook data	2 years after deregistration
General payment details	2 years after deregistration
Vehicle details	10 years after deregistration
Rental details, payment history	10 years after deregistration
Communication data	5 years after deregistration
Data on Rental Conduct, reservation data	5 years after deregistration
Location data	90 days after the end of the rental period
Marketing data	2 years after deregistration
Technical user data (IP address, browser type, click behaviour)	5 years after deregistration

Note: you may request erasure of your personal data as described in section 4. SnappCar will assess this request and accept it if the request is well-founded. SnappCar may refuse a request for certain reasons, for example on account of a statutory duty of retention or in the context of fraud detection.

SnappCar may also keep the collected data in an aggregated and anonymous form for analyses and research, market research and/or fraud prevention.

## **7. How does SnappCar protect my personal information?**

The protection of your personal data is very important to us. That is why SnappCar uses reasonable administrative, technical and physical security measures to protect your personal data from unauthorised access, destruction or modification. We also carry out Privacy Impact Assessments and periodically review our systems by means of external experts and/or software to determine whether our security measures are still adequate.

## **8. Can this privacy policy be changed?**

It is possible for the privacy policy to change in the future. We therefore recommend periodically visiting the part of the Website where the privacy policy can be found.

## **9. What are cookies and how does SnappCar use them?**

While you are using the Website, various cookies will be stored on your computer, mobile device and/or tablet (“Devices”) from where they can be accessed. Cookies are small bits of information (in the form of text) that a server sends to the browser (e.g. Internet Explorer or Firefox) with the intention that the browser returns the information to the server the next time the user visits the Website. Cookies will not damage your Devices or the files stored thereon. Please see [the SnappCar cookie policy](#) for more information on how SnappCar uses cookies.

## **10. Where can I file my complaint?**

If you suspect a breach of data protection legislation and the matter cannot be resolved in consultation between you and SnappCar, you have the right to file a complaint with a supervisory authority.

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If you have any questions or would like more information on the above and/or this topic, please do not hesitate to contact us via [Privacy@snappcar.nl](mailto:Privacy@snappcar.nl).