



2019 – FINAL - 01/10/2019

SNAPPCAR - PRIVACY POLICY

SnappCar takes your privacy very seriously and treats all your personal information with great care. SnappCar always acts in accordance with the General Data Protection Regulation (“GDPR”). This document sets out SnappCar’s privacy policy for the use of SnappCar services. It is recommended that you read this privacy policy carefully. If you have additional questions or would like further information on this topic, please feel free to contact us at Privacy@snappcar.nl.

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1. Who is SnappCar and how can I contact SnappCar?

SnappCar operates an online platform and community marketplace which facilitates the rental of vehicles between persons through its websites www.snappcar.nl, www.snappcar.de, www.snappcar.dk, www.snappcar.se, www.snappcar.com (jointly referred to as: “the website”) and the SnappCar application (referred to as: “the app”). To provide and offer its services, SnappCar processes certain personal data as set out in this Privacy Policy.

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

Within the SnappCar Group of companies, which consists of CarShare Ventures B.V. (as parent company) and local subsidiaries CarShare Germany GmbH, Flexidrive Sverige AB and MinBilDinBil ApS, CarShare Ventures B.V. is Controller and determines the purpose and means of all the data processing and is the responsible party under whose authority the operational data processing takes place.

All questions regarding the processing of personal data by SnappCar can be addressed to Privacy@SnappCar.nl, by regular mail via, Jaarbeursplein 6, 3521 AL Utrecht, The Netherlands and by telephone via +31 (0)30-2087011 (or +49 (0)30-58849323 (Users in Germany), +46 (0)10-8848003 (Users in Sweden), + 45(0)89-8835 86 (Users in Denmark).



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

Name: Lora Mourcous, e-mail: DPO@snappcar.nl

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

2. What personal data does SnappCar process, why and on which legal basis?

To create an account

In order to make use of the SnappCar service, it is necessary to create a personal account. When you create an account, you are required to enter certain information about yourself:

- your contact details (i.e. first name, middle name, surname, e-mail, full address, mobile phone number, date of birth and country) are required to create an account with SnappCar ("**Contact Details**").
- You may, voluntary, add additional personal data to your Contact Details, such as gender, profile picture, pictures, your biography ('about me') and social media links (such as Facebook, LinkedIn and Twitter) ("**Additional Information**").
- Also, you may decide to create an account using your Facebook account, in which event SnappCar processes the following data from your Facebook account: information on your public Facebook profile (name, profile picture, age category, gender, language, country and other specific public information), your Facebook friends lists and your email address ("**Facebook Data**"). Should you decide to register using your Facebook account, SnappCar shall process the Facebook Data as Contact Details.

SnappCar processes these personal data in order to create your account and to allow you to use the website and/or app. The processing of your personal data in this context is necessary for the performance of a contract in connection with the use of the website and/or app to which you are a party (Article 6.1(b) GDPR).

To make a reservation

In order to rent a vehicle through the SnappCar Platform, you are required to provide your Contact Details, a copy of your driving license and payment details (i.e. IBAN account number and account holder name and/ or credit card details).

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

Please cover your photo and personal identification number (“BSN” for NL, “Referensnummer” for Sweden, “Personnummer” for Denmark), before uploading a copy of your driving license, passport or Identity card. Please do not cover the document number.

The processing of your personal data in this context is necessary for the performance of a contract in connection with the use of the website and/or app to which you are (or will become) a party (Article 6.1(b) GDPR).



To offer a vehicle for rental

In order to offer a vehicle for rent through the SnappCar Platform, you are required to provide your Contact Details, a copy of your identity card, driving license or passport (**please cover your photo and personal identification number before uploading a copy**), availability of your vehicle, licence plate number of your car/ vehicle and non-personal vehicle information.

This information is requested and processed by SnappCar in order to enable you to offer your vehicle for rental with SnappCar, to show availability and the location of your car or vehicle ("**Car Data**"). Car Data is furthermore used by SnappCar to verify if your car or vehicle is correctly registered on your SnappCar account and is not registered stolen or missing, and to verify your identity and ownership of the vehicle. In addition, payment details (i.e. bank details, account number and name of your bank as well as the account holder name (as stated on the bank card) are required to process payment.

The processing of your personal data in this context is necessary for the performance of a contract with SnappCar in connection with the use of the website and/or app to which you are a party (Article 6.1(b) GDPR).

To enter into a rental agreement

Contact details of the renter and owner, the car's license plate number, and geolocation ("**Rental Data**"), are required to enter into a rental agreement and in order to have the Insurance Company provide the Insurance coverage.

Note, in order to have the Insurance Company provide Insurance coverage, SnappCar shall transfer Car Data and Rental Data to its insurance company, see <https://www.snappcar.de/versicherung>, <https://www.snappcar.nl/verzekering>, <https://www.snappcar.se/forsakring> or <https://www.snappcar.dk/forsikring> for Contact details of the Insurance Company. The data transfer to the Insurance Company is required in order to set up Insurance Coverage between you and the insurance company, to verify if you meet the requirements, the vehicle is not registered stolen or missing, and to verify your identity and ownership of the vehicle. The processing of your personal data in this context is necessary for the performance of a contract with the Insurance Company to which you are a party.

SnappCar shall provide your Contact Details, Reservation Data and Rental Data, upon request of the Insurance Company, in case 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.

In addition, SnappCar shares the following information between the renter and the owner: your Contact details, Reservation Data, The Rental Agreement, the Rental Data and the Renter's driver's license number (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 facilitate the rent(al) of the vehicle and communication between renters and owners.

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

Profiling and automated decision-making (Fraud detection)



Profiling

To prevent fraud and misuse, and to keep frauds, scammers and other (car) criminals away, SnappCar profiles your personal data, such as your activities on your account, payment preferences, online account preferences, payment details and history, contract duration, services delivered, contact history, website visits, sign up behaviour, communication as chat messages between Users and between Users and SnappCar, preferences and information about connection and devices uses (such as IP addresses and Device ID and specifics) for fraud detection. Profiling means any form of automated processing of your personal information to evaluate certain personal aspects about you, such as to analyse or predict aspects concerning your economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

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.

Automated decision-making

Automated decision-making refers to a decision which is taken solely on the basis of automated processing of your personal data. This means processing using, for example, software code or an algorithm, which does not require human intervention.

As part of the processing of your personal data described above, decisions shall be made by automated means when you register for a SnappCar account and during your use of the service. This means SnappCar may automatically decide that you pose a fraud risk or if our processing reveals your behaviour to be consistent with that of known fraudsters; or is inconsistent with your previous use of the platform; or you appear to have deliberately hidden your true identity.

SnappCar uses third parties to carry out the following automated checks and risk assessments:

- SnappCar provides CrimiMail B.V. (RentalCheck) with your contact details on the basis of which RentalCheck does a check in several registers (ELENA, Reporting point Misconduct Tenant (Meldpunt Wangedrag Huurder), credit score and statistical payment risk, official public records information such as fraud record information and insolvency records, address and phone number validation.
- Rental Check also does a check in the RDW register (NL) to verify your driver's license on validity based on your license number and date of birth.
- For Swedish Users Smart 365 (Sweden only) verifies your driver's license at the Transport Authority (TransportStyrelsen) on validity based on your license number and expiry date.
- To provide you the service Onfido will collect and process your identification documents and verifies the likelihood the document and the photograph provided is genuine and, if applicable, cross-references the information written on the document with the validated identity as provided in the User account. Please check the [privacy policy](#) from Onfido for further information regarding the data protection during this process.
- Sift Science analysis your email address, your billing address, your home address, your user name, your phone number, your IP address, Device ID details, your user behaviour on our website, your booking details, your payment details like the amount of the invoice(s), method of payment and credit card number, to prevent fraud and fraudulent behaviour on our website. Please check the



privacy policy from Sift Science for further information regarding the data protection during this process [privacy policy](#).

- For Swedish Users, the Register / System of the Swedish Car Rental Association (Biluthyrarna) is checked on driver's license numbers and personal ID-numbers, to verify whether a user is registered (i.e. users who have stolen/frauded, shown aggressive behaviour or have not paid bills (after credit collection)). Sweden only.

Automated decision-making in the context of fraud prevention is necessary for entering into, and performance of, a contract between you and SnappCar in relation to the use of the SnappCar platform.

Outcome profiling and automated decision-making

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

SnappCar makes sure that the outcomes are regularly reviewed to ensure they remain fair, effective and unbiased.

Your rights

In the circumstances described above and where automated decision-making is used in the assessment of your registration and fraud prevention, you can contact SnappCar to request that any declined decision is reconsidered by a human. If you want to opt out of automatic decision-making, let us know, although it may mean you cannot make use of the SnappCar platform as automated decisions are necessary to provide the services in a safe manner. For more information about your rights in relation to the processing of your personal data, please see section 4 below.

Monitoring hiring and rental behaviour

To allow renters and users to check your hiring and rental behaviour, this data (reviews, post user experiences, rental and hiring data and frequency) will be generated by SnappCar on the basis of your reservations and may be added 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.

Payment history

Should you fail to comply with payment instructions and / or are sent to debt collecting services, SnappCar processes this debt collection data for the purpose of collecting the debt as well as cancellation of your SnappCar 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 for keeping the platform safe.

Customer Service



To provide (international) customer service we may collect and share your personal data (Contact Details, Reservation Data, Car Data and Rental Data) to respond to your questions, including helping you with any issues which may arise regarding your reservation(s), rental(s) or the services. If you use the online chat function, the data processed by SnappCar for this purpose are browser data and data that you enter in the contact form to or a chat conversation 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 being able to serve you efficiently and to optimize SnappCar's customer service.

SnappCar Keyless (Keyless rental)

To enable keyless rental(s), SnappCar collects the geolocation data of the vehicle. This information is requested and processed by SnappCar in order to enable you to offer your vehicle for keyless rental with SnappCar, to show the location of your vehicle to the renter. In addition, SnappCar may store log file information, such as events, status, location and speed, for fraud detection and prevention.

You can find more information about personal data that is processed in relation to your keyless rental in the relevant privacy policy : <https://snappcar.nl/policies/en/keyless-privacy-policy>

In the event of you are a 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 facilitate the keyless rent(al) of the vehicle between renters and owners, enable locating the vehicle and to detect and prevent fraud.

With respect to owners, the processing of the abovementioned information is based on consent (Article 6.1(a) GDPR) provided by the owners when they enter into a SnappCar Keyless Owner Agreement to have the keyless equipment installed in their vehicle.

SnappCar Lease & Share and SnappCar Drive & Share

If you entered into a private lease car contract with one of our car leasing partners which includes (obligatory) sharing on the SnappCar platform, you can find more information about personal data that is processed in relation to your private lease application in the relevant privacy policy:

<https://privatelease.snappcar.nl>

Information notice

In order to send you information notices (not being marketing communications) required to provide the services (such as push notifications, system notifications, email notifications and text messages an owner receives if a renter is interested in a vehicle, or a notice when a reservation has not been completed), we may use your mobile phone number and/or your e-mail address. SnappCar may also send you information in relation to a reservation and a questionnaire or review form after you made a reservation. The processing of your personal data in this context is necessary for the purposes of the legitimate interests pursued by SnappCar (Article 6.1(f) GDPR), namely to provide users sufficient information about their use of the service and to review optimize the service.

Communication and reviews

To allow you to communicate with other registered users, and to upload reviews and experiences, SnappCar may process your name, car data, profile picture and reviews. SnappCar may post user



experiences on its website providing personal data of users. 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 to facilitate communication between users.

Emails

Newsletter

SnappCar wishes to inform you on the developments of its products and service. Therefore, if there is a change or an update to the service, SnappCar will inform you thereof only if you have signed up for SnappCar's newsletters. SnappCar may also send you personalized newsletters depending on among other things your place of residence, your account activity and behaviour, and whether you are a renter or an owner. For example, if you are a renter the SnappCar newsletter may contain tips to rent your car on time if you live in a place where SnappCar expects an increase of rentals.

To the extent required, the subscription uses a Double-Opt-In-Procedure. After the subscription on our website you receive a conformation email, which requires you to confirm your subscription. This whole process is documented and saved by SnappCar. That includes the time of the subscription and of the confirmation and your IP address.

If, at any moment, you do not wish to receive emails of SnappCar anymore, you can change the settings in your account. An opt-out option is also provided in every email that SnappCar sends you.

To subscribe you have to provide us with your email address. 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.

Advertising e-mails

You can subscribe to our advertising messages. Our advertising email may contain information about new offers, services from SnappCar or products/ services from other partners, etc. To subscribe you have to send us your email address. Other information which are used to optimize the advertising email can be entered voluntarily. SnappCar may also send you personalized advertising mails depending on among other things your place of residence, your account activity and behaviour, and whether you are a renter or an owner. For example, if your car needs a MOT test, SnappCar may send you an advertising mail that contains an offer from a partner for a MOT test. With the subscription to our advertising email you agree in the reception of advertising messages. The email address used by your application will only be used to send you our advertising emails, unless you have given us permission to use your email for different purposes. It is always possible to withdraw your consent in receiving our advertising emails. To unsubscribe please use the given link in our advertising emails or change the settings in your account. The processing of these personal data is necessary for the purposes of the legitimate interests pursued by SnappCar, namely direct marketing (Article 6.1(f) GDPR).

Email tracking

SnappCar included email tracking and link tracking features in its emails by embedding a small transparent image pixel in the outgoing email. If the email is opened, SnappCar may have access to certain information, such as the name and surnames of the recipient; the recipient's email address; subject of the email; date and time in which the email was sent; confirmation that the recipient received



the email; confirmation that the recipient has opened the email after it has been received; timestamp of each email opening; the history of the times (number, date and time) the recipient has opened the received email; IP from which the email was opened; browser and operating system used by the recipient who opened the email; number of links included in the email; text and URL of such links; number of clicks made on each of them by the recipient; timestamp of each click on the link; IP from which the link was clicked on and browser and operating system used by the person who has clicked on 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 mails send by SnappCar.

Push Notifications

When you use our app (or website) via a push-enabled device, you can consent in receiving push messages. We are using Apple Push Notification Service (iOS version) from Apple Inc., 1 Infinite Loop, Cupertino, CA 95014 („Apple Notification“) or Google Cloud Messaging (Android version) from Google Inc. (www.google.de), 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA („Google Notification“).

Via Apple and Google, you can receive for example updates to the status of your bookings or useful notifications as push messages. In order to transmit push messages to your device, we will transmit data (for example the notification that you have a new message in your app mailbox) to the server of Apple and Google, which they will than encrypt and forward to your app and your device. To ensure a safe allocation from your message to your device, we will transmit to Apple and Google your device ID token. A device ID token is a distinct connection number which is created from your device ID.

The processing of your data is only based on your consent (Article 6.1(a) GDPR). You can always withdrawal your consent to the reception of push messages. To withdrawal your consent, you can deactivate these messages at any time by changing the notification settings in your account or your device settings or by uninstalling the SnappCar app from your device.

Please check the privacy policy of Apple and Google for further information regarding the data protection during this process.

Marketing

Advertising is only effective if it is relevant to you. SnappCar may therefore use your personal data to create customer profiles and display personalized advertisements on and outside the SnappCar website. Based on the information you share with us, SnappCar may show individualized offers, which may include third-party offers. We do not forward the data to our partners, but our partners can recognize that you have clicked the partner link on our website. The processing of your data is only based on your consent (Article 6.1(a) GDPR). Please note that you are entitled to object to the profile building and can withdraw your consent to receive individualised advertising at any time at the contact details given in sect. 4.

Custom Audience (Facebook)



SnappCar may participate in Facebook's Custom Audience program which enables SnappCar to display personalized ads to persons on the SnappCar email lists when they visit Facebook.com. SnappCar provides personal information such as your name, place of residence, zip code, email address and phone number to Facebook to enable Facebook to determine if you are a registered account holder with Facebook. You may opt-out of participation in SnappCar's Facebook Custom Audience by sending an email from the email address you are opting out of, to the email address provided in our contact information below. For your opt-out to be effective, you must: (i) place the following text in the subject line of the email - "Opting Out of Facebook Custom Audience Ads", and (ii) in the body of the email, include your name and email address. We will forward your name and email address to Facebook.com with a request to delete you from all of our Facebook Custom Audience Ads.

The processing of your data to display personalized ads to persons on the SnappCar email lists when they visit Facebook is only based on your consent (Article 6.1(a) GDPR).

Data aggregation

To minimize the processing of personal data, SnappCar may aggregate or encrypt your personal data to create anonymous data which cannot be derived 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 automatically collects generated data about your use of the website. This information consists of your IP address (an unique number, which makes it possible to recognize your device); account activity (including storage usage, number of log-ins); data displayed or clicked on (including UI elements, links); and other log information (including browser type, IP address, date and time of access, cookie ID, and referrer URL). SnappCar requires this information in order for the website to work as optimally as possible (for example, to display content correctly and to 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).

Processing for analysing and (scientific) research purposes by third parties

SnappCar may provide aggregated data with third parties that request such data for analyzing or (scientific) research purposes, such as universities. SnappCar only provides data that is aggregated. For example, SnappCar shares the number of transactions in a specific zip code area. The provision of these personal data is necessary for the purposes of the legitimate interests pursued by these third parties (Article 6.1(f) GDPR), namely to perform research.

Processing for analyzing to improve the platform, the service and customer experience

SnappCar uses personal data provided by you and generated through your use of the SnappCar platform to analyze the use of the platform, the service and customer experience, in order to make improvement or develop new updates. For example, SnappCar may decide to delete functionalities that are (almost) never used. In addition, SnappCar could analyze whether a specific area has more demand than supply, in which case SnappCar decide to provide rental cars in a different way to meet the



demands. The processing of these personal data is therefore necessary for the purposes of the legitimate interests pursued by SnappCar (Article 6.1(f) GDPR).

Local law compliance

To comply with applicable law, SnappCar may be required to process all your personal data for other purposes than set out in this privacy policy, such as law enforcement and to meet valid court orders. The processing of your personal data in this context is necessary for compliance with a legal obligation to which SnappCar is subject (Article 6.1(c) GDPR).

3. In which cases does SnappCar disclose my personal data to third parties?

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

- In order to complete the reservation, SnappCar needs to share relevant reservation data between the **renter** and the **owner**. This may include information such as your Contact Details.
- To provide the services, SnappCar shares your personal data with **service providers**. These service providers process your personal data on behalf of SnappCar. The processing by service providers is governed by a data processing agreement in which SnappCar has ensured that the service provider shall only process the personal data on instructions of SnappCar. Some of these service providers are also located outside the European Economic Area (EEA), namely the United States. To comply with EU data protection laws around international data transfer, SnappCar only allows service providers outside the EEA to process your personal data if they are self-certified under the E.U.-U.S. Privacy Shield and the Swiss-U.S. Privacy Shield framework (Article 46.2(a) GDPR) or in accordance with a contract entered into between the SnappCar and the service provider, incorporating the European Commission's Standard Contractual Clauses, which ensure that adequate data protection arrangements are in place (Article 46.2(c) GDPR).
- Examples of service providers SnappCar shares your data with, for the purposes of the legitimate interests pursued by SnappCar, namely to provide the services to you, are:
 - **Stripe:** We process payments through the Payment Service Provider Stripe Payments Europe, Ltd. 1 Grand Canal Street Lower, Grand Canal Dock Dublin ("Stripe"), An Ireland based company to process payments. SnappCar instructed Stripe to process all payments on our website. Therefore, we transfer your payment details (i.e. name, address, IBAN account number and account holder name 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. In individual cases, Stripe may request additional personal information, such as a copy of your ID, to comply with the laws and regulations that apply to online payment systems. For more information visit www.stripe.com. Please check the [privacy policy](#) from Stripe for further information regarding the data protection during this process.
 - **Zendesk:** We process customer inquiries via the ticket system Zendesk, a customer service platform by Zendesk Inc., 989 Market Street #300, San Francisco, CA 94102 („Zendesk“). All necessary data (for example name, surname, street address, phone number, email address) will be recorded via our website to answer your inquiry. Please check the [privacy policy](#) from Zendesk for further information regarding the 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. To comply with EU data



protection laws around international data transfer, Zendesk self-certified under the E.U.-U.S. Privacy Shield and the Swiss-U.S. Privacy Shield framework (Article 46.2(a) GDPR).

- **customer.io:** We use the service customer.io from Peaberry Software Inc., 921 SW Washington St, Suite #820, Portland, OR 97205, USA; („customer.io“) on our website. Customer.io is sending emails to our registered customers on our behalf. To use customer.io a cookie will be placed on your computer and your browser will create a direct connection to the customer.io server. The cookie will track your activities on our website and send you notifications based on your activities. Customer.io also offers statistical analysis of usage data by identifying users. Customer.io will therefore process information (for example if an email was received or if it was rejected by the server). Please check the data protection policies from customer.io for further information regarding the data protection during this process. To comply with EU data protection laws around international data transfer, Customer.io self-certified under the E.U.-U.S. Privacy Shield and the Swiss-U.S. Privacy Shield framework (Article 46.2(a) GDPR).
- **Sift Science:** We use the analysis tool Sift Science from Sift Science Inc, 123 Mission St. 2000, San Francisco CA 94105) („Sift Science“) on our website. Sift Science analysis your email address, your billing address, your delivery address, your user name, your phone number, your IP address, your user behaviour on our website, your booking details, your payment details like the amount of the bill, method of payment and credit card number, to prevent fraud and fraudulent behaviour on our website. Please check the privacy policy from Sift Science for further information regarding the data protection during this process [privacy policy](#). 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. To comply with EU data protection laws around international data transfer, Sift Science self-certified under the E.U.-U.S. Privacy Shield and the Swiss-U.S. Privacy Shield framework (Article 46.2(a) GDPR).
- **Onfido Ltd:** We use on our website the service Onfido, a service by the UK based company Onfido Ltd. (40 Long Acre, Covent Garden, London, WC2E 9LG, United Kingdom) (“Onfido”) to verify identification documents. To provide you the service Onfido will collect and process your identification documents and verifies the likelihood the document provided is genuine and, if applicable, cross-references the information written on the document with the validated identity. Please check the [privacy policy](#) from Onfido for further information regarding the 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 verify identification documents and thus ensure the reliability of the service.
- In order to have the **Insurance Company** provide Insurance coverage, SnappCar shall transfer Car Data and Rental Data to its insurance company, see <https://www.snappcar.de/versicherung/> / <https://www.snappcar.nl/verzekering>, <https://www.snappcar.se/forsakring> or <https://www.snappcar.dk/forsikring> for Contact details of the Insurance Company. The data transfer to the Insurance Company is required in order to set up Insurance Coverage between you and the insurance company, to verify if you meet the requirements, the vehicle is not registered stolen or missing, and to verify your identity and ownership of the vehicle. The processing of your personal data in this context is necessary for the performance of a contract with Insurance Company to which you are a party (Article 6.1(e) GDPR).
- In order to provide Road Assistance Services, SnappCar shall transfer Car Data and Contact Details to Eurocross Assistance Netherlands B.V., (Eurocross – Dellaertweg 1, 2316 WZ Leiden) for Dutch



Users. The processing of these personal data is necessary for the purposes of the legitimate interests pursued by SnappCar, namely to provide road assistance to you.

- SnappCar provides CrimiMail B.V. (RentalCheck - Hanzeweg 12A, 2803 MC Gouda, the Netherlands), RDW (Postbus 30.000, 9640 RA Veendam, the Netherlands), Smart Software 365 AB (Fältmätargatan 19, 721 35 Västerås, Sweden) and Biltuhyrarna Sverige AB (Karlavägen 14A, 1 TR, 11143 Stockholm, Sweden) with your personal data in order to do assessments in relation to fraud detection and prevention. See for more information section 2 of this Privacy Policy.
- In order to do assessments in relation to credit scores and credit ratings, SnappCar may provide your personal data to a third party (such as CrimiMail B.V. in The Netherlands and such as UC AB or Creditsafe I Sverige AB in Sweden). The processing of these personal data is necessary for the purposes of the legitimate interests pursued by SnappCar, namely to verify credit scores, fraud detection – and prevention and thus ensure the reliability of the service.
- Mobility as a Service platforms: SnappCar may share information about your car, availability of the car as indicated in your profile and the zip code with mobility as a service platforms (such as ritjeweg.nl). These parties display this information on their website in order to refer website visitors to the SnappCar platform in the event they are interested in renting a vehicle.
- **Social Plug-Ins:** We use on our website a variety of social plugins. We do not collect any personal data our self. To prevent that data is transmitted without your knowledge to a service provider in the USA, we are using the so-called Shariff solution. The Shariff solution prevents in a first step that any personal data is transmitted to a social plugin, when you visit our website. Only if you click on a social plugin can data be transmitted and saved. If you visit our website a direct connection from your browser to the respective server of the social network is created. The content of the plugin is transmitted directly from the respective social network to your browser and from there to our website. We therefore have no impact on the scale of data which the respective social network is collection using its plugin. Hence, we inform you that, to the best of our knowledge, the respective social network will at least receive the information that you have visited our website. If you use the plugin, the respective information (for example the usage of the Like/Share button) will be transmitted and saved by the social network.

If you are logged in your personal social network account during your visit on our website, the social network can match your visit to your account. If you do not want such a match to occur, your will have to log out of your social network and you will have to delete your cookies before visiting our website. You can also typically withdrawal your consent for the usage of your data for advertising purposes in the account settings of your social network. If you are no member of a social network there is still the possibility that a social network can save your IP address. We are using the plugins of the following social networks:

- Facebook
 - Twitter
 - Google+ / YouTube
 - LinkedIn
 - Bing
- **Social Media:** We maintain next to our website also a presence on different social networks. If you visit such a presence it is possible that your personal data is transmitted to the respective social network. It is possible that the data you specifically entered in the social network as well as other information is collected, analysed and used by the provider of the social network. Furthermore, it is



possible that the provider of the social network collects and processes the most important information about your computer system, from which you are visiting the social network (for example your IP address, the used processor type and your browser version including all plugins).

If you are logged in your personal social network account during your visit on our social media presence, the social network can match your visit to your account. If you do not want such a match to occur, you will have to log out of your social network and you will have to delete your cookies before visiting our social media presence.

Please check the privacy policies from the respective social network for further information regarding the data protection during this process:

- [Facebook](#)
 - [Twitter](#)
 - [Google+](#) / [YouTube](#)
 - [LinkedIn](#)
 - [Bing](#)
- **Third party content:** We include on our website third party content (for example YouTube videos, maps from Google Maps, RSS-Feeds or images from other websites). To display the third-party content to you, we are transmitting your IP address to the respective third parties. We have no impact whether a third party is using your IP address only to display their respective content or collects and saves it for further purposes. If we gain knowledge of such behaviour, we will inform you 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 display third party content.
 - **Competent authorities:** insofar as it is required by law or is strictly necessary for the prevention, detection or prosecution of criminal acts and fraud, SnappCar discloses personal data to law enforcement and other governmental authorities. The processing of your personal data in this context is necessary for compliance with a legal obligation to which SnappCar is subject.
 - **Merger and Acquisition:** SnappCar may transfer your personal data to third parties in the event of a merger, acquisition, reorganization, sales of assets, bankruptcy or insolvency event of SnappCar. If needed by applicable law, SnappCar shall obtain your prior consent. The processing of these personal data is in this context necessary for the purposes of the legitimate interests pursued by SnappCar.

Please contact SnappCar at privacy@snappcar.nl, if you have any questions about your data being transferred to third parties.

4. What are my rights?

Under the GDPR, you have a number of rights with regard to your personal data and the processing thereof:

- you have the right to obtain from SnappCar confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to your personal data and additional information about the processing of your personal data;
- you have the right to request from SnappCar the rectification of inaccurate personal data concerning you;
- in certain cases, you have the right to ask SnappCar to erase your personal data (right to be forgotten);



- in certain cases, you have the right to obtain from SnappCar restriction of processing of your personal data, for example when you have contested the accuracy of your personal data;
- upon your request, you have the right to receive your personal data which you have provided to SnappCar in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, where the processing is based on your consent or on a contract;
- you have the right to object to processing of personal data which is based on the legitimate interests of SnappCar. SnappCar shall no longer process the personal data unless SnappCar demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims;
- where personal data are processed for direct marketing purposes, you always have the right to object to processing of personal data for such marketing. In that case, SnappCar shall 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 does not affect the lawfulness of processing based on consent before its withdrawal.

You may send your request to SnappCar at Privacy@snappcar.nl. SnappCar shall respond to your request without undue delay and in any event within 30 days of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. SnappCar shall inform you of any such extension within 30 days of receipt of the request, together with the reasons for the delay.

If SnappCar does not take action on your request, SnappCar shall inform you without delay and at the latest within 30 days of receipt of the request of the reasons for not taking action. In that case, you also have the right to lodge a complaint with the supervisory authority and to seek a judicial remedy.

5. How can I deregister from SnappCar and what happens to my personal data if I do?

You can deregister as user of the services provided by SnappCar by sending an email to Privacy@snappcar.nl, stating that you wish to deregister or via the Contact Form on the website. SnappCar will process such requests without undue delay, at least within 4 weeks after receipt, or as otherwise required by applicable law.

After deregistration certain personal data may be retained, such as your hiring and renting history, as indicated below in the data retention paragraph.

6. How long does SnappCar retain my personal data?

In accordance with the GDPR and otherwise required by applicable law, SnappCar retains your personal data for the periods mentioned in the table below. Retention periods start at the day of deregistration.

DATA	RETENTION PERIOD
Contact details (first name, middle name, surname, e-mail, full address, mobile phone number, date of birth and country)	Maximum 10 years
Driving license (copy)	Maximum 6 months
Identification card / passport (copy)	Maximum 6 months



Additional information (gender, profile picture, pictures, biography ('about me') and social media links)	Maximum 2 years
Facebook data (public Facebook profile (name, profile picture, age category, gender, language, country and other specific public information), Facebook friends lists and email address)	Maximum 2 years
Payment information (i.e. IBAN account number and account holder name and/ or credit card details)	Maximum 10 years
Vehicle data (availability of the vehicle, licence plate number and other non-personal vehicle information etc.)	Maximum 10 years
Rental data (contact details of the renter and owner, the car's license plate number, and geolocation etc.)	Maximum 10 years
Communication/Review data (communication with other registered users, uploaded reviews and experiences, username, car data, profile picture and reviews)	Maximum 2 years
Hiring/Rental behaviour data (reviews, post user experiences, rental and hiring data and frequency etc.)	Maximum 2 years
Marketing Data (personal data collected through tracking cookies)	Maximum 2 years
Reservation Data (contact Details, copy driving license and payment details)	Maximum 10 years
Fraud detection data (account activities, payment preferences, online account preferences, payment details and history, contract duration, services delivered, contact history, website visits, sign up behaviour and fraud detection results)	Maximum 7 years

Note, for fraud protection purposes we may retain necessary personal data for a reasonable period of time, which may exceed the data retention period as listed above. SnappCar may also retain personal data longer if this is required by applicable law.

SnappCar may always retain the collected data in an aggregated and anonymous form to make analyses and investigations, for market research purposes and/ or for fraud protection.

7. How does SnappCar protect my personal information?

The protection of your Personal Data is of our highest concern. SnappCar has therefore implemented reasonable administrative, technical and physical security measures to protect your Personal Data against unauthorized access, destruction or alteration of information. Further we do annual Privacy Impact Assessments, as well as monthly scans of our systems by a specialised Security Organisation, to determine whether our security measures are still appropriate.

8. Can this privacy policy be amended?

It is possible for the privacy policy to be amended in the future. It is therefore recommended to regularly visit the section on the website in which we outline the privacy policy.

9. What are cookies and how does SnappCar uses them?

When using the website, various cookies are saved on your computer, mobile device and/or tablet ("Devices"), which can then be accessed. Cookies are small pieces of information (in the form of text) that a server sends to the browser (such as Internet Explorer or Firefox) with the intention that the



browser sends this information back to the server the next time a user makes use of the website. Cookies cannot damage your Devices or the files saved on it. Please consult the SnappCar cookie policy [<https://s3-eu-west-1.amazonaws.com/snappcar-legal-documents/terms-and-conditions/EN/CookiePolicyEN.pdf>] for more information about how SnappCar uses cookies.

10. Where can I lodge my complaint?

In case you suspect a breach of data protection legislation and the matter is not solved amicably between you and SnappCar in negotiations, you have the right to lodge a complaint with a supervisory authority.

If you have additional questions or would like further information on the above and/or this topic, please feel free to contact us at privacy@snappcar.nl.