

# PRIVACY POLICY

## 1. BASIC INFORMATION

<b>Data Controller</b>	CARSHARING MOBILITY SERVICES ITALY, s.r.l.
<b>Purposes of processing</b>	<ul style="list-style-type: none"> <li>• Management of “Mobility Services” provision and, in general, management, development and compliance with the established relationship.</li> <li>• Customer and consumer service.</li> <li>• Profiling with internal sources.</li> <li>• Compliance with legal obligations related to the Service.</li> <li>• Marketing communications.</li> <li>• Third party marketing communications.</li> <li>• Management of promotions.</li> <li>• Geolocation.</li> <li>• Management of external fraud and contractual breaches.</li> <li>• Processing and management of images collected in case of road accident or similar events that could give rise to claims.</li> <li>• Analysis of the user's driving and identification of high-risk events.</li> </ul>
<b>Categories of data</b>	<ol style="list-style-type: none"> <li>1. Identifying and contact data;</li> <li>2. Personal characteristics;</li> <li>3. Commercial information;</li> <li>4. Economic, financial and insurance information;</li> <li>5. Data derived from the use of the service;</li> <li>6. License plates and images of stakeholders.</li> </ol>
<b>Categories of data subjects</b>	The user who subscribed to our “Mobility Services” and shares with us its personal data in the use of our Application and Website as defined in the General Conditions of Car Sharing Mobility Services Italy, s.r.l.
<b>Origin of the data</b>	<ul style="list-style-type: none"> <li>• Personal data provided by Users</li> <li>• Personal data obtained as a result of the use of the App by Users.</li> <li>• Where appropriate, external sources, meaning entities different than CARSHARING MOBILITY SERVICES ITALY s.r.l.</li> </ul>
<b>Profiling</b>	<ul style="list-style-type: none"> <li>• To sending Users personalised commercial communications adapted to their needs, preferences and personal circumstances.</li> <li>• To ensuring the safety of property and individuals, identifying high-risk behaviours.</li> </ul>
<b>Rights of data subjects</b>	Access, rectification, erasure, restriction of processing, opposition, portability, opposition to automated individual decisions and revocation of consent.
<b>Additional information</b>	Additional and detailed information regarding the processing of personal data is provided below.

## 2. ADDITIONAL INFORMATION ON DATA PROTECTION

The present Privacy Policy regulates the processing of the data collected by CARSHARING MOBILITY SERVICES ITALY s.r.l. (hereinafter, the **Company**) through the Application (hereinafter, the **App**) and/or the Website within the framework of the provision of the multi-user carsharing service within an operational area, subject to the availability of the vehicles, offered by the Company (hereinafter, the **Service**). This Policy forms an integral part of the General Terms and Conditions of Use. The Company recommends the User to read our Privacy Policy carefully.

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

In relation to the personal data requested through the forms provided in the App, it will be necessary for the User to provide at least those marked with an asterisk, since, if this data, considered necessary, is not provided, the Company will not be able to accept and manage the request.

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

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

Data controller identity: **CARSHARING MOBILITY SERVICES ITALY s.r.l.**

Registered tax number: **12278290965**, VAT no. **12278290965**

Registered address: **Via Guido Capelli 12, Milano (MI) 20126**

Contact address: **Via Guido Capelli 12, Milano (MI) 20126**

E-mail: [ciao@zity.eco](mailto:ciao@zity.eco)

Data Protection Officer: [dpoitmilan@zity.eco](mailto:dpoitmilan@zity.eco)

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

The personal data that the User provides to us may be processed by the Company for any of the purposes detailed below, depending on the type of data provided to us and the interactions that the User performs through the Service:

### 1. Provision of Mobility Services:

- **Purpose:** Provision, management, of the “Mobility Services”, as well as provision of assistance to the User. Identification of the user and verification of compliance with the necessary requirements for the rental of vehicles without a driver.
- **Data processed for this purpose:** Identifying and contact data (ID card and driver’s license); Economic, financial and insurance data; Transactions of goods and services; Other categories of data; Data derived from the use of the service.
- **Lawful basis for processing:** Performance of contract.

### 2. Transactional management:

- **Purpose:** Management of collection, payments, non-payments, invoicing, claims, accidents and administrative infringements. And, in general, any type of transactional management necessary for the provision of the service. In connection with the management of the Service's payment gateway, the data may be transferred internationally to a processor located in the USA (PayPal, Inc.), which provides appropriate contractual guarantees on the basis of European regulations. If you choose the option to save your payment (card) data, we inform you that your payment data will be retained and will be auto-completed for subsequent rentals, so that you do not need to enter your payment data for each new

process, and they will be considered valid and valid for subsequent rentals. The card's security code (CVV or CVC) will only be used for the current rental. Users may modify or delete their cards at any time through the My Account - Payments and Promotions section.

- **Data processed for this purpose:** Identifying and contact data; Economic, financial and insurance data; Transactions of goods and services; Other categories of data; Data derived from the use of the service.
- **Lawful basis for processing:** Performance of contract.

### 3. Customer service:

- **Purpose:** Attention to requests, complaints, suggestions or claims related to the provision of Carsharing services.
- **Data processed for this purpose:** Identifying and contact data; Other categories of data.
- **Lawful basis for processing:** Performance of contract.

### 4. Profiling with internal sources:

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

### 5. Compliance with the Company's legal obligations in relation to the Carsharing Services:

- **Purpose:** Fulfilment of the Company's legal obligations in relation to Carsharing Services, provided that the processing of User data is necessary for this purpose.
- **Data processed for this purpose:** Identifying and contact data; Economic, financial and insurance data;

Transactions of goods and services; Other categories of data; Data derived from the use of the service.

- **Lawful basis for processing:** Compliance with legal obligations.

#### 6. Marketing communications:

- **Purpose:** The Company may send its own commercial communications to Users in order to promote the use of the Service and share content related to the Carsharing Services. Additionally, if you give us your consent, we may send communications via WhatsApp.
- **Data processed for this purpose:** Identification and contact details.
- **Lawful basis for processing:** Legitimate interest of the Company to arouse interest and promote the purchase of our products and services and to enhance the image of the Company. You may request further information on how we have assessed our legitimate interest and your own interests by contacting us at [dpoitmilan@zity.eco](mailto:dpoitmilan@zity.eco). The legal basis for using WhatsApp is consent, which you may withdraw at any time.

#### 7. Third Parties Marketing Communications:

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

#### 8. Management of promotions:

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

#### 9. Geolocation:

- **Purpose:** In order to provide Carsharing services, the Company may require the use of geolocation data of Users.
- **Data processed for this purpose:** Identifying and contact data; Other categories of data.
- **Lawful basis for processing:** Performance of contract.

#### 10. Management of external fraud and contractual breaches:

- **Purpose:** Management of specific and proven cases of fraud and non-compliance with our General Terms and Conditions of Use .
- **Data processed for this purpose:** Identifying and contact data; Social circumstances; Transactions of goods and services; Other categories of data; Data derived from the use of the service.
- **Lawful basis for processing:** Legitimate interest of the Company to preserve its rights. You may request further information about how we have assessed our legitimate interest and your own interests by contacting us at [dpoitmilan@zity.eco](mailto:dpoitmilan@zity.eco).

#### 11. Processing and management of images collected in case of road accident.

- **Purpose:** In the event of traffic accidents or similar circumstances, the vehicle's sensors may activate the cameras installed on the front of the vehicle to capture the images necessary to process any potential claims arising from the event. No sounds will be recorded, only twenty seconds of video will be captured before and after the event, and these images will be managed to guarantee the legal protection of the Company.
- **Data processed for this purpose:** Data derived from the use of the vehicle -for the activation of the cameras-, license plates and images of stakeholders. Sounds will not be collected.
- **Lawful basis for processing:** Legitimate interest of the Controller in ensuring the effective legal protection of the Company. You may request further information about how we have assessed our legitimate interest and your own interests by contacting us at [dpo@zity.eco](mailto:dpo@zity.eco).

#### 12. Analysis of the user's driving and identification of high-risk events.

- **Purpose:** Identification of high-risk events that are collected through the devices installed in the vehicle to inform the user when dangerous situations are detected (such as short distance with the vehicle in front, high speed, large accelerations, braking and sharp turns), to warn the user of them by means of acoustic signals and/or voice or video messages. Hazardous events will be recorded in the Company's or vendor's systems and, if applicable, may result in the charging of an additional fee and/or the blocking of the account of users who violate the terms of service.
- **Data processed for this purpose:** Data derived from the use of the vehicle and identification data.

- **Lawful basis for processing:** Legitimate interest of the Controller to ensure the safety of users and the security of property and vehicles. You may request further information about how we have assessed our legitimate interest and your own interests by contacting us at [dpoitmilan@zity.eco](mailto:dpoitmilan@zity.eco).

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

The personal data processed by the Company as a result of interactions carried out by Users through the App come from the following sources:

- Personal data provided by Users through the forms made available by the Company.
- Personal data (registration data only) obtained from the Mobilize Share App.
- Personal data obtained as a result of the use of the Services by Users, including vehicle safety sensors.
- Subject to consent, if required by applicable data protection laws, from external sources, i.e., from entities that are not the Company.

## To whom are your personal data communicated?

The Company informs you that your data may be communicated to the following entities in accordance with the legitimate basis of the communication:

- For the purpose of the proper performance of the contractual relationship, we may communicate your data to:
  - Financial institutions and payment gateways, for the management of collections and payments.
  - Third-party or auxiliary service entities, such as those engaged in the provision of services for the identification of possible urban parking spaces in relation to the user's location, for which the user must have requested the provision of the service from such third-party entities.
  - Insurance companies, for the management of claims and/or accidents.
- In order to comply with applicable legal obligations, we may disclose your data to:
  - Tax Agency and other competent administrations, for the fulfilment of tax obligations.
  - Competent public administrations, for the identification of drivers in compliance with the applicable regulations.

- Other public administrations and/or competent authorities, such as State Security Forces and Corps, to the extent necessary and/or as required by the applicable regulations.
- In order to fulfil our legitimate interests, for example, in the case of accident image recordings, we may disclose your data to:
  - Insurance companies, for the management of claims and/or accidents.
  - Other public administrations and/or competent authorities, such as State Security Forces and Corps, to the extent necessary and/or as required by the applicable regulations.
  - Courts and tribunals.

The Company may disclose personal data to service providers who access such data on behalf of the Company, acting as data processors. These processors provide services such as technology support, identity verification, customer relationship management, and payment processing, among others. Specifically, data may be processed by the following processors:

- Google Cloud Platform, as the provider of cloud infrastructure and services.
- Salesforce, as the CRM platform used to manage user relationships.
- PayPal, for the management of electronic payments and financial transactions.

The Company has entered into the corresponding data processing agreements with all of them, as required by Article 28 of the GDPR. These agreements ensure that data is processed in accordance with the Company's instructions and that an adequate level of security and confidentiality is maintained. You can obtain more information about our data processors by contacting us at [dpoitmilan@zity.eco](mailto:dpoitmilan@zity.eco).

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

## How long do we retain your personal data?

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

## What are your rights as data subject?

The User has the right to access their personal data and to obtain confirmation of how we're processing them, as well as to request the **rectification** of inaccurate data or, where appropriate, request its **erasure** when, among other reasons, the data is no longer necessary for the purposes of processing they were collected for.

Under certain circumstances, data subjects may request the **restriction** of the processing of their data, in which case we will only keep them for the exercise or defense of claims. The User can also **oppose** to the processing of data based on grounds relating to their particular situation, in which case we will stop processing the data, except for compelling legitimate reasons or for the exercise or defense of claims.

In certain circumstances, the User may exercise the right to **data portability**, having the right to receive the personal data concerning him or her and provided to us, in a structured, commonly used and machine-readable format and to transmit, without hindrance, such data to another Data Controller, where technically feasible.

The User also has the right not to be subject to a decision based exclusively on automated data processing, including profiling, which could produce legal effects on him or her or significantly affect him or her.

Finally, the User may **revoke** his or her consent at any time, in the event that the consent has been granted for a specific purpose, without affecting the lawfulness of the data processing, based on the User's consent granted prior to revocation.

Similarly, the Company reminds the User that he may object, at any time, to the processing of his personal data for commercial or promotional purposes.

In order to exercise the rights described or revoke the consents granted, the User may contact [-] indicating "Data Protection" as the subject or send an email to the following address: [ciao@zity.eco](mailto:ciao@zity.eco). The Company informs the User that, in order for the right exercised to be effective, additional documentation may be required as proof of the applicant's identity if he/she does not have less intrusive means at his/her disposal (e.g. a copy of his/her national identity document or passport).

For further information on the processing of personal data, the User may contact the Company Data Protection Officer ([dpoitmilan@zity.eco](mailto:dpoitmilan@zity.eco)). Likewise, the User may lodge a complaint with the competent data protection supervisory authority, which in Italy is the Garante per la Protezione dei Dati Personali.