

# Greenwheels Privacy Statement

Reliability is a key value for Greenwheels. We consider it important to protect your privacy. Naturally, we need some personal details from you to be able to provide you with the right service.

We are also constantly looking for ways to improve our services and products where necessary and adjust it to your personal wishes and needs. We will handle your personal data carefully and ensure that all processing of your personal data complies with the applicable legislation.

## 1. Who is responsible for processing your data?

In this privacy statement Collect Car B.V. (hereafter: "Greenwheels" "we" or "us") explains how Greenwheels, as a controller, handles your personal data in order to provide you with the right service.

## 2. What is personal data?

Personal data constitutes of any information relating to an identified or identifiable natural person.

## 3. Personal data which we process

We process personal data which you have provided to us and/or personal data which was made available when concluding an agreement for the rental of a Greenwheels vehicle. We also process your personal data when you use our app, website and/or Customer Services.

### Data provided or made available to us

If you conclude an agreement with Greenwheels we require the following personal data from you, which you provide or make available to us:

- name, date of birth and contact details (address, telephone number, e-mail address);
- payment details and financial data like IBAN number and payment method;
- driving license details;
- number of your public transport card (if applicable);
- other data relevant for the specific agreement.

### Data about your use of the vehicle, the Greenwheels app and other services

If you use our services or otherwise have contact with Greenwheels, we process the following personal data as part of our service provision:

- customer number(s);
- card number(s);
- your preferred form of communication and settings;
- data concerning the use of the Greenwheels vehicles: start and end of the rental period, the distance driven in kilometres, the location of the vehicle at the start and end of the rental period, the status of the relevant vehicle, fuel consumption;
- the frequency of use of Greenwheels services;
- recordings of telephone conversations and emails contact.
- Other details relevant for the specific agreement.

If you are required to provide certain data, you will be informed about the possible consequences if you do not wish to provide this data.

#### **4. Processing: principles and legitimate interests**

The processing of personal data takes place according to the following legal principles of the General Data Protection Regulation:

1. consent;
2. execution of an agreement;
3. legal obligation;
4. fulfilling a task in the common interest;
5. legitimate interest of Greenwheels.

Our legitimate interests include among others: marketing, advertising, security, prevention (of crime), IT management, research and analysis of our products or services, business operation, legal matters and internal management.

#### **5. Purposes of processing personal data**

Greenwheels processes your personal data for the purposes listed below:

- to provide customers with a vehicle of choice during the rental period;
- Performing administrative transactions (i.e. invoicing) as part of the execution of the agreement.
- to send notifications of service or assistance during the rental period and to detect and resolve errors;
- to inform customers, interested parties and stakeholders about Greenwheels products and services;
- to provide promotional material and keep customers, interested parties and stakeholders informed of special offers, announcements, newsletters, events, surveys and other products or services that could be of interest;
- to offer fully functional app's, websites and provide the services from these app's and websites;
- to develop new services and products or to improve existing services and products;
- to constantly improve our services and products for customer, interested parties and stakeholders.

#### **6. Theft monitoring and services of third parties**

Greenwheels retains the right to verify objective facts that could relate to an emergency or serious infringement of the General Terms and Conditions (including theft, vandalism, driving in a foreign country or an accident) and use them to take emergency measures and determine the geographic location of the Greenwheels vehicle.

If third-party services are called on during the rental or registration (for example, vehicle services), Greenwheels is justified in communicating the customer's personal data (like name and phone number) to these third parties to the extent necessary for implementing the agreement with the customer, like emergency help, traffic fines etc. Only relevant personal data will be shared which is required for further follow-up with third parties.

Greenwheels can notify law enforcement agencies and provide them with personal data from customers when necessary or legally obliged.

## **7. Processing of data for scientific research**

We can process data to contribute to research for business, social and/or scientific purposes. For these purposes we sometimes share data with third parties. We will always take appropriate measures (for example pseudonymized data) to protect your privacy. The personal data involved will no longer be directly traceable to you as a natural person.

## **8. Sharing with third parties**

In addition to the above, Greenwheels shares your personal data with third parties:

- in case of a disruption or if you have a question about the Greenwheels service provision or if necessary for the correct operation of the Greenwheels service provision, qualified Greenwheels staff and/or suppliers engaged by Greenwheels can access your personal data to help you;
- to supply a service required for the above-mentioned purposes, for example, service providers in the field of hosting, research and market research;
- for maintenance and support;
- as result of a transaction, for example when Greenwheels decides to sell or transfer part or all of its company. Greenwheels can transfer information that it has collected and stored, including personal information, to the party or parties involved in the transaction, as part of that transaction;
- to comply with legal obligations or orders from competent authorities.

If these third parties are labelled as processor in conformance with the applicable data protection legislation, Greenwheels will have written processing agreements with these parties. Processors engaged by Greenwheels act under the instructions and responsibility of Greenwheels.

## **9. International data transfer**

The personal data collected by Greenwheels are stored on servers of a suppliers of Greenwheels in the European Economic Area (EEA). If personal data is sent to a recipient located abroad, this generally is only done to a recipient in a country that according to the European Commission has a similar level of personal data protection.

If personal data is sent to a recipient in a country which does not have a similar level of personal data protection, Greenwheels will ensure that the regulatory safeguards are maintained, such as concluding an EU model contract or requiring Privacy Shield certification of the recipient.

## **10. Data retention**

We store personal data in line with our internal storage policy and/or as long as (i) you are a customer of Greenwheels or continue to show interest in Greenwheels' products and services, (ii) we are legally obliged to store the data, or (iii) saving the data is necessary for legitimate business purposes.

## **11. Your rights, including the right to object**

You have the right to know which personal data we process and which (category of) recipients your data is shared with. Along with the right to inspect you also have the following legal rights:

- the right to correct your personal data;
- the right to restrict the relevant processing;
- the right to have your personal data deleted;

- the right to data portability;
- the absolute right to object to direct marketing;
- the right to object to processing for the legitimate interests of Greenwheels;
- the right to submit a complaint to the Autoriteit Persoonsgegevens;
- the right to withdraw your consent if this forms the basis for our processing of your personal data.

You can only exercise your rights to the extent that they are granted to you by law. To ensure that the request to inspect or another request has been made by you, we ask you to include a copy of your proof of ID. We ask you to make the passport photo, MRZ (machine readable zone; the line with numbers at the bottom of the passport), passport number, personal ID number (BSN) and signature unrecognisable on this copy.

## **12. Cookies**

Greenwheels uses cookies to analyse the use and enhance the quality of our website and services. More information on this subject can be found in our cookie policy.

## **13. Contact**

For questions and/or comments referring to this privacy statement, please contact: Greenwheels, PO Box 23191, 3001 KD Rotterdam, The Netherlands. Our Privacy Officer can be reached by e-mail at ([privacy@greenwheels.com](mailto:privacy@greenwheels.com)) and by post at the address given above (attn. 'Privacy Officer').

## **14. Amending this privacy statement**

The way in which we process your personal data and the composition or quantity of data we process may vary in time. Therefore, we retain the right to amend this privacy statement. We shall announce these amendments in conformance with the legal requirements.

This statement was last revised on November 15th. 2019