

PRIVACY POLICY

In this document (hereinafter referred to as **the Privacy Policy**) we explain how we process your personal data collected by us in CityBee mobile app during your use of CityBee vehicles – cars, bicycles, scooters (hereinafter referred to as **Vehicles**). We invite you to review this Privacy Policy carefully.

We use the collected personal data to ensure seamless provision of services and continuous improvement of service quality and functioning of CityBee mobile app (hereinafter referred to as **the Mobile App**). We may be unable to rent you CityBee vehicles or provide the services related to their use unless we get the requested personal data.

We process personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (the General Data Protection Regulation) (hereinafter referred to as **GDPR**) and other legal acts governing personal data protection and this Privacy Policy.

The terms used in the Privacy Policy must be interpreted in accordance with the definitions contained in BDAR and in the terms and conditions of CityBee vehicle rent and service provision unless otherwise provided in this Privacy Policy.

We may update the Privacy Policy from time to time, therefore we recommend that you review it periodically. We will inform you of any changes by posting the updated Privacy Policy on the Mobile App. In case we materially amend the Privacy Policy, we will send you the respective notification by e-mail.

I. WHO IS IN CHARGE OF YOUR PERSONAL DATA PROCESSING?

The controller (hereinafter referred to as **we, the Company**) which processes your personal data provided in the Mobile App and collected during the use of the Vehicles is:

Prime Leasing UAB

Company registration number 302565318,

Ozo g. 10A, 08200 Vilnius, Lithuania

Contact details for giving any questions related to personal data protection: info@citybee.lt, +370 700 44844.

II. WHAT IS OUR LEGAL BASIS FOR PERSONAL DATA PROCESSING?

Your data will be processed on the basis of:

- **Your consent (-s):**
 - which you gave by your express confirmation, as you installed the Mobile App in your mobile device and selected its settings;
 - which you gave by your express confirmation, as you uploaded the image of your driving license's both sides and the image of your face to the Mobile App for the purpose of establishing your identity and online verification of your right to drive;
 - a separate consent for the provision of direct marketing offers via e-mail and using an active telephone pop-up alerts (*push notifications*);
 - a separate consent for the provision of personalised direct marketing offers via e-mail and using active telephone pop-up alerts (*push notifications*);
 - your separate permission for the Mobile App to access the data of your device's camera and geolocation data of your device;
 - Your consent to record your telephone conversation with our customer service centre.
- **Our contractual arrangements with you for Vehicle rent and services:**
 - The terms and conditions of CityBee vehicle rent and service provision.
- **Applicable laws (legal obligations)**, such as taxes, financial accounting, traffic safety regulations and other legislation.
- **Our legitimate interests** including fraud prevention, analysis, debt management, transmission of data about debts to debt recovery companies and credit rating agencies, creditworthiness assessment, network and information security, sharing evidence of possible criminal actions with the state authorities, GPS tracking to ensure our asset security and the implementation of agreement with you on CityBee vehicle rent and services, and other legitimate interests.

Important:

- **if you give no permission to process your personal data for direct marketing purposes, you will be sent only non-promotional e-mails and messages (short messages (SMS), push notifications) in relation to the use of CityBee services;**
- **you may refuse any active phone push notifications by changing your device's operating system settings.**

III. WHAT PERSONAL DATA DO WE COLLECT AND FOR WHAT PURPOSES THEY ARE USED?

3.1. Upon the installation of the Mobile App and selection of its settings

The device will function properly only if the Mobile App is given permission to use the following device's data: the device's operating system and the device model. **If you disagree that the Mobile Apps receives these data, do not install the Mobile App on your device and do not select its settings. If you have already done this without reading this Privacy Policy available on Google Play and App Store platforms first, you should immediately delete the Mobile App from your device before the installation.**

For analysis and advertising purposes, we use third-party tools such as Google Firebase, Google Ads, and Facebook Ads, to enable ourselves to collect aggregated and depersonalised information about how people use the Mobile App, understand how we can improve and provide relevant non-personalised advertising of our services. **If you disagree with the processing of data for the purposes described above, do not install the Mobile App on your device and do not select its settings. If you have already done this without reading this Privacy Policy available on Google Play and App Store platforms first, you should immediately delete the Mobile App from your device before the installation.**

3.2. Account creation in the Mobile App

If you intend to start using the Mobile App, you need to register in the App by providing the personal data required in accordance with the terms and conditions of CityBee vehicle rent and service provision. We have the right to request provision of and process the following data: your name, contact information (telephone number, e-mail address), address, credit card information (card type, bank name, card number, validity period), the image of your driving license's both sides, the data provided on the first side of your driver's license (name, personal identification number, date of birth, driving license expiration date, the image of your face).

We need the image of your face (a selfie), the photo on your driving license and the data provided in your driving license to be able to establish your identity and the right to drive cars as you rent them. For this purpose, before the start of service provision, we will have to verify your driving license, i. e., (i) to check whether the image of your face made using the Mobile App matches the image of the face on the driving license (by automated means using algorithms selected by the service provider) and (ii) to check the validity of the driving license. You may choose to have this verification performed via the internet, by uploading the image through the Mobile App or, if you disagree, you may call us at the phone number +370 700 44844 and we will find the best solution to suit your expectations. We will use third-party services for the purposes of the aforementioned verification.

We have the right to perform periodical checks or updates of your driving license according to the verification procedure while you are using CityBee vehicles and services. If we find that your driving license is about to expire, we may contact you (by e-mail or by push notifications) and notify you about the expiry of the driving license.

3.3. Use of the Mobile App

When you use the Mobile App, we record your activities (e. g., reservation of Vehicles, their locking/unlocking, etc.); besides, we collect other data related to service use (Vehicles you have used, date and time of use, places where the Vehicle was taken and left, route of the Vehicle, speed, fuel and fuel card usage, etc.). The Mobile App will be able to use your device's geolocation data, the camera integrated on your device and to send you Mobile App messages if you give such permission in the Mobile App and/or in your device's settings. Please remember that if you do not permit using the aforementioned data/functions, some Mobile App functions may not function, and you may not be able to start renting CityBee Vehicles and/or using the services.

Your contact information (e-mail address, telephone number (send via SMS)) can be used to provide information relating to the services used, amendments of the terms and conditions of CityBee vehicle rent and service provision, the price list, etc. The information referred to above can also be sent as push notifications of the Mobile App. **You can opt-out Mobile App push notifications at any time by changing the settings of your device's operating system.**

We process your personal data (name, e-mail address, CityBee vehicle use data) for the purposes of personalised direct marketing (including the marketing of our partners, e. g., catering, vehicle maintenance, custodial service providers, etc.) using e-mails or push notifications only after obtaining your explicit and unambiguous consent through the Mobile App. **You have the right to withdraw your consent at any time by phone: +370 700 44844; e-mail: info@citybee.lt, by clicking on the link "Unsubscribe newsletter subscriptions" at any time or by unchecking the option to receive marketing messages in the Mobile App.**

Please note that if permitted by the national legislation, we have the right to send general direct marketing messages of a general nature by e-mail based on your legitimate interest for offering services or for asking you to express your opinion about our services. In addition, you can always give us permission to receive such messages as push notifications. **You have the right to withdraw your consent at any time by telephone: +370 700 44 844; e-mail: info@citybee.lt, by clicking on the link "Unsubscribe newsletter subscriptions" at any time or by unchecking the option to receive marketing messages in the Mobile App.**

3.4. Use of vehicles

Each Vehicle is equipped with an electronic system which records the location of the Vehicle, the distance travelled by the Vehicle, the Vehicle operating time, speed and other Vehicle-related data their use and transmits such data to us. We need this for CityBee vehicle rent and service provision in accordance with the terms and conditions of CityBee vehicle rent and service provision.

If during your use of the Vehicle by connecting your device to wired or wireless devices of the Vehicle, including but not limited to navigation, multimedia systems, your device's data will be stored in the Vehicle, unless you remove them in accordance with the Vehicle manufacturer's instructions. **While using a Vehicle you must remove the data of your device from the memory of the Vehicle devices yourself. If you have failed to remove the data, we do not accept any liability in respect thereof.**

When you register in the Mobile App and are using CityBee vehicle rent and services, we have the right, to the extent permitted by applicable law and subject to our legitimate interests (risk assessment, our asset protection, ensuring the security of third parties and their property, collection of charges for the provided services), take account of your creditworthiness, debt, driving experience, the respective road traffic offenses, history of insured events related to you (e. g., for speed) over the period of Vehicle use, and make decisions based on these data, which may affect the provision of our services to you (if you already use our services).

If you fail to comply with your financial obligations under the terms and conditions of CityBee vehicle rent and service provision and fail to pay your debt within 30 calendar days from the date of receipt of the notice, to the extent permitted by applicable law, we are entitled to transfer your debt and personal data (including name, personal identification number) to the persons who have a legitimate interest, joint debtor files for debt management and/or recovery purposes based on our and third parties' legitimate interest.

If during your registration in the Mobile App and/or use of CityBee vehicle rent and services we have any doubts that you will not be able to pay for the services rendered and we suffer damage as a result, based on their legitimate interest (risk assessment, protection of our assets, collection of charges for the services rendered), in certain cases (e. g., if you intend to rent an exclusive vehicle, are planning a trip abroad, are planning to use the vehicle for longer than usual, or you request to defer the payment, the travel price exceeds 250 euros, and if there are other serious circumstances which may cause any kind of risk), we may ask Creditinfo Lietuva UAB to provide lawfully available data about you (including your credit rating, etc.) and to assess them for solvency, debt management and/or recovery purposes.

If you contact our customer service centre by telephone and give your consent to the recording of your telephone conversation, we will record the information and data (including personal data) provided by you to be able to duly process your request.

In case of an accident in which the Vehicle is involved, we will process the collected personal data related to the accident to be able to compensate the damage to the persons involved in the accident jointly with our insurance companies and/or the ones of the persons involved in the accident.

In order to improve and refine the quality of CityBee vehicle rent and services, we may analyse non-personal, statistical data (such as Vehicle use date and time, the location where the vehicle was taken and left, the Vehicle route, speed, fuel and fuel card use, etc.) we have collected during your use of CityBee vehicle rental and services via the Mobile App.

IV. WILL WE SHARE YOUR INFORMATION WITH OTHERS?

We may use third-party services (third-party data centres, servers, verification of documents, photos, administration, payment, auditing, accounting, legal and consulting services, debt collection, Mobile App usage analysis and statistical services, direct marketing services, e-mail programs, short messages, etc.) or cooperate with partners in relation to the provision of services when we need access to your personal data to a certain extent. In this case, we shall ensure that third parties comply with their obligations of confidentiality and appropriate protection of personal data.

If necessary, your personal data may be produced to the competent state and municipal authorities, in accordance with applicable legislation and/or on grounds of our legitimate interests.

In case of an accident in which the Vehicle is involved, your data will be transmitted to insurance companies and, if necessary, to the other parties involved in the accident.

Based on the available data on the Vehicle we have the right and, in certain cases, an obligation to report information on road traffic offences (such as speeding, drunk driving) to the competent authorities (e. g., the police).

V. FOR HOW LONG SHALL WE STORE YOUR PERSONAL DATA?

Personal data collected for CityBee rent and service provision must be stored as long as they are necessary for the purposes for which the personal data were collected or obtained, except in the following cases in which data can be stored longer than for the required period:

- (i) for the performance of legal obligations which require personal data processing;
- (ii) for preserving information on suspected criminal acts;

(iii) for the establishment, exercise or defence of legal claims.

Your personal data shall be stored:

- (i) for Vehicle sharing service administration purposes (i. e., client registration and accounting, contract management and monitoring of their performance, debt recovery and fines) for 3 months if the services are rejected; for 5 years after the date of expiry of the contract. Details of the clients who failed to fulfil their financial and/or property obligations or caused damage to the Company shall be stored for an additional period of 5 years;
- (ii) for ensuring the protection of the assets (rented Vehicles) possessed by the Company (GPS data) – for 3 years;
- (iii) for direct marketing purposes – for 3 years, but not beyond the validity period of your consent;
- (iv) the records of telephone conversations with you shall be stored for a period not exceeding 6 months.

VI. WHAT ARE YOUR RIGHTS?

We seek to ensure that your personal data are processed in a transparent manner so that you were able to implement your rights as a personal data subject. As a personal data subject, you have the following rights:

- (i) you have the right to be informed about the processing of personal data and to request access to them or copies of your personal data so that you were able to know the purposes of your personal data processing, their storage period, etc.;
- (ii) you have the right to request us to modify or update your personal data if they are inaccurate or incomplete;
- (iii) you have the right to request that all or some of your personal data are not processed temporarily or in general;
- (iv) you have the right to request to terminate your personal data processing if we no longer have any legitimate interest or legal obligation to process them;
- (v) in certain cases, e. g., when personal data are processed for direct marketing purposes, you have the right to request deletion of your personal data used for direct marketing messaging;
- (vi) you have the right to request to transfer your personal data to another service provider in a structured and machine-readable format.

For the purposes of your personal data processing, we do not use automated decision-making processes, including profiling, which may produce legal effects on you or similarly significantly affect you. However, when processing your personal data for direct marketing purposes, we may assign you to a certain category of customers, therefore you have the right to require human intervention to express their views or to oppose such assignment.

If you intend to exercise your rights, you should contact us via e-mail info@citybee.lt; however, before that, you will have to prove your identity by means of electronic or other communication, so that we can properly identify you in accordance with the statutory procedure.

We will provide information as soon as possible, but no later than within one month from the date of your application. We will provide information free of charge, however, if your requests are manifestly unfounded or excessive, in particular, because of their repetitive character, we may charge a reasonable fee based on administrative costs or refuse to act on the request.

You have the right to lodge complaints in relation to our processing activity; however, we will try to resolve any misunderstandings together with you first. If you are still dissatisfied with our response, you will have the right to submit a complaint to the State Data Protection Inspectorate www.vdai.lrv.lt.

VII. HOW WE WILL TAKE CARE OF YOUR PERSONAL DATA SECURITY?

We use appropriate technical and organisational measures to ensure personal data security, including protection of data against unauthorised processing and accidental loss, destruction or damage. These measures are selected taking account of the risks that may arise to your as data subject's rights and freedoms.

We strictly control access to personal data processed and provide it only to the employees of the company who need personal data to perform their work and monitor how they use the granted access. Company employees who have access to personal data are acquainted with personal data protection requirements and ensure the confidentiality of personal data processed.

We regularly monitor our systems for possible violations or attacks. However, it is impossible to ensure the security of information transmitted via the internet. Having this in mind, you transmit information via the Mobile App using the internet connection at your own discretion and risk.

We provide access to personal data with passwords of the required level and prepare arrangements for the protection of confidential information with individuals who have access to your personal data.

VIII. HOW CAN YOU CONTACT US REGARDING THIS POLICY?

If you have any additional questions or comments, please contact us via e-mail info@citybee.lt or by telephone +370 700 44844.