

## PRIVACY POLICY

Valid from and including 14 February 2020.

### 1. INTRODUCTION

Volvo Car Mobility Sweden (secondary business name for Sunfleet Carsharing AB), reg. no 556575-8298, is providing vehicles for rental through a car sharing service (the “Service”) to users who have entered into a certain user agreement with regard to the Service and with employees at companies that have entered into customer agreements with regard to the Service.

Volvo Car Mobility Sweden and its parent entity Volvo Car Mobility AB, reg. no 556955-6441, both with address Jakobsbergsgatan 17, 111 44 Stockholm, Sweden, along with Volvo Car Corporation, reg. no 556074-3089, with address Assar Gabrielssons Väg, 405 31 Gothenburg, Sweden, hereinafter jointly referred to as “we”, “our” and “us”, will as joint controllers process your personal data as described below.

We respect your privacy and are committed to protecting your personal data. This privacy policy, inter alia, contains information about the purposes for which we process your personal data, with whom we share it, and what rights you have in relation to your personal data in connection with your use of the Service.

### 2. CATEGORIES OF PERSONAL DATA, PURPOSE OF PROCESSING AND LEGAL BASIS

We process personal data in the ways and for the purposes set forth in the tables below.

For each purpose, we must have a legal basis. A legal basis could e.g. be (i) your consent to the relevant processing activity, (ii) that the processing is necessary in order for the performance of an agreement to which you, or (iii) that we or a third party have a legitimate interest to process the personal data which is not overridden by your interest of not having the personal data processed. In the tables below, the categories of personal data, retention period and legal basis that we rely on for each purpose will be identified. If automated decision-making (including profiling) occurs for any purpose, information regarding this will be provided in connection with the processing of your personal data described in the tables below and/or in section 11.

Purpose	Processing activities	Categories of personal data
Administering and managing your user account	<ul style="list-style-type: none"><li>– Creating and administering your account for using the Service</li><li>– Creating login features and verifying you at login</li><li>– Ensuring your identity and age</li><li>– Identity and driver’s license check against the Swedish Transport Agency’s Record of Road Traffic</li></ul>	<ul style="list-style-type: none"><li>– Name</li><li>– Personal identity number</li><li>– Possession of driver’s license and license information (if the license is valid, license number, expiration date, license class and information on whether the license has been reported as lost or stolen)</li><li>– Credit information from credit information companies</li><li>– User data for your user account (customer number, user name, password)</li></ul>

	<ul style="list-style-type: none"> <li>– Checking of address through Swedish Population Address Register (“SPAR”)</li> <li>– Credit information check to ensure your solvency</li> <li>– Managing your customer choices (e.g. profile and settings)</li> </ul>	<ul style="list-style-type: none"> <li>– Contact information (e-mail address, phone number, address)</li> <li>– Type of membership</li> <li>– Company (if your account is connected to a corporate account)</li> </ul>
<p><b>Legal basis:</b> <i>Performance of the user agreement.</i> This processing is required for us to be able to carry out our obligations pursuant to the user agreement that we have entered into with you with regard to the Service.</p>		
<p><b>Retention period:</b> Until your user account is terminated.</p>		

Purpose	Processing activities	Categories of personal data
Administering and managing your user account	<ul style="list-style-type: none"> <li>– Identity and driver’s license check</li> </ul>	<ul style="list-style-type: none"> <li>– Copy of driver’s license</li> </ul>
<p><b>Legal basis:</b> <i>Legal obligation.</i> We are obligated under law to check that you have a valid driver’s license. Identity and driver’s license checks will primarily be conducted by way of checks against the Swedish Transport Agency’s Record of Road Traffic but if you do not have a Swedish driver’s license or such checks otherwise are not possible or appropriate, we will ask you to provide a copy of your license.</p>		
<p><b>Retention period:</b> During a period of 3 months from when the check was made.</p>		

Purpose	Processing activities	Categories of personal data
Administering and managing admin accounts for corporate customers	<ul style="list-style-type: none"> <li>– Creating and administering an admin account for our corporate service</li> <li>– Creating targeted offers and discounts for your company regarding our corporate service</li> </ul>	<ul style="list-style-type: none"> <li>– Name</li> <li>– Company</li> <li>– User data for your admin account (customer number, user name, password)</li> <li>– Contact information (e-mail address, phone number, address)</li> </ul>
<p><b>Legal basis:</b> <i>Legitimate interest.</i> This processing is necessary for us to carry out our obligations pursuant to the customer agreement that we have entered into with your company with regard to the Service and to provide the Service to your company and its users as well as to administer, invoicing, reminders, payments, claim and our accounting.</p>		

**Retention period:** During the term of our customer agreement with your company and for a period of 2 years thereafter. Information relating to payments and where processing is required under law will be retained for a period of 7 years after the termination of the customer agreement.

Purpose	Processing activities	Categories of personal data
Managing reservations and rentals of vehicles	<ul style="list-style-type: none"> <li>– Delivery (including notifications and correspondence regarding the delivery)</li> <li>– Managing payments (including analysis of possible payment solutions which may include inspection of payment history and obtaining of credit information)</li> <li>– Vehicle adjustments based on user preferences</li> <li>– Inspection of mileage, fuel levels etc. prior to and after use</li> <li>– Managing of complaints and guarantee matters</li> <li>– Checking if congestion charges or bridge tolls has been charged during the rental period</li> <li>– Checking compliance with and enforcing the user agreement</li> <li>– Recovering vehicles</li> </ul>	<ul style="list-style-type: none"> <li>– Name</li> <li>– Personal identity number</li> <li>– Possession of driver’s license and license information</li> <li>– Contact information (e-mail address, phone number, address)</li> <li>– User account details</li> <li>– Payment information (credit card number, billing address, transaction sum)</li> <li>– Payment history and credit information</li> <li>– Rental information (such as which vehicle that has been rented, within which geographical area the vehicle may be used, time and place for pick-up and drop-off, relevant use restrictions and requests for certain features by the user).</li> <li>– GPS position</li> </ul>

**Legal basis:** *Performance of the user agreement and each reservation.* This processing is required for us to be able to carry out our obligations pursuant to the user agreement and each reservation.

**Retention period:** During the term of the user agreement and for 6 months thereafter to be able to handle potential complaints, as well as for such longer time necessary that is necessary in order for us to establish, exercise or defend legal claims.

Purpose	Processing activities	Categories of personal data
Managing customer support matters	<ul style="list-style-type: none"> <li>– Identification</li> <li>– Customer support contacts (in our app, by phone or in digital channels, including social media)</li> <li>– Investigating and handling complaints and claims in connection with usage of the Service, e.g. when we assist you solving a problem arising in connection with you renting a vehicle from us</li> </ul>	<ul style="list-style-type: none"> <li>– Name</li> <li>– Personal identity number</li> <li>– Contact information (e-mail address, phone number, address)</li> <li>– Information provided by you in connection with the customer support matter</li> <li>– Information regarding time and place for pick-up and delivery of a vehicle</li> <li>– Information regarding time and place of an incident during use of the Service</li> <li>– GPS position</li> </ul>
<p><b>Legal basis:</b> <i>Legitimate interest</i>. This processing is necessary to meet our and your legitimate interest in managing complaints and customer support matters.</p>		
<p><b>Retention period:</b> Until the customer support matter is completed as well as during the time necessary in order for us to establish, exercise or defend legal claims.</p>		

Purpose	Processing activities	Categories of personal data
Providing customer support and roadside assistance during reservations	<ul style="list-style-type: none"> <li>– Locating vehicle in case of an incident or another customer support matter</li> </ul>	<ul style="list-style-type: none"> <li>– GPS position</li> </ul>
<p><b>Legal basis:</b> <i>Legitimate interest</i>. This processing is necessary to meet our and your legitimate interest in handling support matters and assisting you in case of incidents when using the vehicle.</p>		
<p><b>Retention period:</b> The data will be processed for the duration of the reservation as well as for the time necessary to establish, exercise or defend legal claims.</p>		

Purpose	Processing activities	Categories of personal data
Complying with a legal obligation	<ul style="list-style-type: none"> <li>– Booking of financial transactions</li> <li>– Necessary handling to fulfil legal obligations pursuant to law, judicial decision or official</li> </ul>	<ul style="list-style-type: none"> <li>– Name</li> <li>– Personal identity number</li> <li>– Contact information (e-mail address, phone number, address)</li> </ul>

	decision (e.g. the Swedish Accounting Act ( <i>Sw. bokföringslagen</i> ), Car Rental Act ( <i>Sw. Lag om biluthyrning</i> ))	<ul style="list-style-type: none"> <li>– Payment history</li> <li>– Payment information</li> <li>– Your correspondence with us</li> </ul>
<p><b>Legal basis:</b> <i>Legal obligation.</i> The processing is required by law. If the data is not provided, we are not able to fulfil our legal obligations and we are forced to deny the rental.</p>		
<p><b>Retention period:</b> During the term of the user agreement and for 7 years after termination for book-keeping and otherwise the retention period required by law.</p>		

Purpose	Processing activities	Categories of personal data
Investigating damages on and loss of vehicles	<ul style="list-style-type: none"> <li>– Creating a damage report for the relevant insurance company</li> <li>– Communicating with you in order to collect information regarding the course of events</li> <li>– Investigating how damages arose on the vehicle</li> </ul>	<ul style="list-style-type: none"> <li>– Name</li> <li>– Personal identity number</li> <li>– Possession of driver’s license</li> <li>– Copy of driver’s license</li> <li>– Contact information (e-mail address, phone number, address)</li> <li>– Information regarding the reservation</li> <li>– Information provided by you during the investigation, including information generated from your usage of the vehicle</li> <li>– Damage number</li> <li>– Vehicle data</li> <li>– GPS position</li> </ul>
<p><b>Legal basis:</b> <i>Legitimate interest.</i> This processing is necessary to meet our and your legitimate interest in investigating damages on the vehicle.</p>		
<p><b>Retention period:</b> The data will be processed until the investigation of the damages is completed and any possible compensation from the insurance company is disbursed as well as during the time necessary in order for us to establish, exercise or defend legal claims.</p>		

Purpose	Processing activities	Categories of personal data
Marketing of the Service and related and similar services	<ul style="list-style-type: none"> <li>– Creating targeted offers and discounts and inspirational communication regarding our services, including offers to participate in future tests and studies</li> <li>– Analyzing the information we collect for this purpose to categorize you into a suitable target group which is the basis for targeted offers and discounts as well as other customized communication</li> </ul>	<ul style="list-style-type: none"> <li>– Name</li> <li>– Contact information (e-mail address, phone number, address)</li> <li>– Age</li> <li>– Gender</li> <li>– Booking history</li> <li>– User plan and contract status</li> <li>– IP address</li> <li>– Company (if your account is connected to a corporate account)</li> </ul>

**Legal basis:** *Legitimate interest.* This processing is necessary to meet our legitimate interest to provide our services and to ensure that receives relevant information and communication.

**Retention period:** During the term of the user agreement and for 2 years thereafter.

Purpose	Processing activities	Categories of personal data
Marketing via a third party	<ul style="list-style-type: none"> <li>– Sharing your personal data with a third party.</li> <li>– Letting a third party, where you are a member, send you targeted offers to you.</li> <li>– Letting a third party, where you are a member, create a profile of you in order to be able to reach out to people with a corresponding profile to yours that also are members at such third party</li> </ul>	<ul style="list-style-type: none"> <li>– E-mail address</li> </ul>

**Legal basis:** *Consent.* We will ask for your consent to carry out this processing.

**Retention period:** During the term of the user agreement and for 2 years thereafter.

Purpose	Processing activities	Categories of personal data
Performing user surveys	<ul style="list-style-type: none"> <li>– Obtaining and analyzing the results from forms and interviews</li> <li>– Compiling statistics of usage of the Service</li> </ul>	<ul style="list-style-type: none"> <li>– Name</li> <li>– Contact information (e-mail address)</li> <li>– Age</li> </ul>

		<ul style="list-style-type: none"> <li>– Address</li> <li>– Booking history</li> <li>– The answers you provide</li> </ul>
<p><b>Legal basis:</b> <i>Legitimate interest.</i> This processing is necessary to meet our legitimate interest to carry out user surveys to develop our services. Participation in such surveys are always optional.</p>		
<p><b>Retention period:</b> The data will be processed during a maximum of 2 years after the survey was carried out.</p>		

Purpose	Processing activities	Categories of personal data
Ensuring that vehicles rented out are used within the agreed territory	<ul style="list-style-type: none"> <li>– Checking where the vehicle is located in the event that it is not returned on time or it is driven outside the agreed territory</li> </ul>	<ul style="list-style-type: none"> <li>– Name</li> <li>– Contact information (e-mail address, phone number, address)</li> <li>– GPS position</li> </ul>
<p><b>Legal basis:</b> <i>Legitimate interest.</i> This processing is necessary to meet our legitimate interest to enforce the user agreement and to protect our property.</p>		
<p><b>Retention period:</b> During the term of the user agreement as well as for the time necessary to establish, exercise or defend legal claims.</p>		

Purpose	Processing activities	Categories of personal data
Offering of discounts (e.g. to a trade union member)	<ul style="list-style-type: none"> <li>– Registration of discount code based on membership, employment etc.</li> </ul>	<ul style="list-style-type: none"> <li>– Name</li> <li>– Personal identity number</li> <li>– Contact information (e-mail address, phone number, address)</li> <li>– Membership discount status</li> </ul>
<p><b>Legal basis:</b> <i>Legal claims.</i> This processing is necessary to meet our and your legitimate interest to provide you with discount offers that you are entitled to due to memberships etc.</p>		
<p><b>Retention period:</b> During the term of the user agreement as well as for the time necessary to establish, exercise or defend legal claims.</p>		

Purpose	Processing activities	Categories of personal data
Evaluating, developing and improving our services	<ul style="list-style-type: none"> <li>– Adjusting our services to become more user friendly (e.g. by changing the user interface to simplify the flow of information or to highlight features that are often used by our users in our digital channels)</li> <li>– Obtaining supporting information to develop and improve our range of vehicles and stations</li> <li>– Obtaining supporting information to improve IT systems in the purpose of increasing the level of security for our users</li> <li>– Analyzing the data we collect for this purpose. Based on the data we collect (e.g. age and gender) you are sorted into a group of customers (so called customer segment) in which analyses are performed on an aggregated level, without any connection to you as an individual. The result of the analysis is a basis for improving our services.</li> </ul>	<ul style="list-style-type: none"> <li>– Age</li> <li>– Gender</li> <li>– Residential area</li> <li>– Correspondence and feedback regarding our services</li> <li>– Purchase and user generated data (e.g. clicking and visit history)</li> <li>– Technical data regarding units used and their settings (e.g. language settings, IP address, browser settings, operating system, resolution and platform)</li> <li>– Information regarding how you have interacted with us, i.e. how you have used the service, login method, where and for how long webpages have been visited, response time, downloading errors, how you reach and leave the service etc.</li> <li>– Booking history</li> <li>– Vehicle data</li> </ul>
<p><b>Legal basis:</b> <i>Legitimate interest</i>. This processing is necessary to meet our and our users' legitimate interest to have our services evaluated, developed and improved.</p>		
<p><b>Retention period:</b> From collection and 3 years thereafter.</p>		

Purpose	Processing activities	Categories of personal data
Evaluating, developing and improving our services	<ul style="list-style-type: none"> <li>– Following the vehicle in order to provide information during a reservation regarding history, leisure interests, restaurants, fuel stations or other places or services of interest</li> </ul>	<ul style="list-style-type: none"> <li>– GPS position</li> <li>– Places and services of interest</li> </ul>
<p><b>Legal basis:</b> <i>Consent</i>. We will ask for your consent to carry out this processing. Giving consent is completely voluntary.</p>		
<p><b>Retention period:</b> Until your user account is terminated.</p>		



Purpose	Processing activities	Categories of personal data
Complying with requests from police and other authorities as well as enforcing the user agreement	– Providing information regarding the use of our vehicles to police and other authorities following requests, e.g. in relation to the investigation of a crime or the violation of laws or regulations, including traffic rules (e.g. speeding)	<ul style="list-style-type: none"> <li>– Name</li> <li>– Personal identity number</li> <li>– Contact information (e-mail address, phone number, address)</li> <li>– Time and duration of use of vehicle</li> <li>– Payment history</li> <li>– GPS position</li> <li>– IP address</li> </ul>
<p><b>Legal basis:</b> <i>Legal obligation alternatively legitimate interest.</i> This processing will be performed when so required under law. We may also provide information to authorities when necessary to meet such authorities' legitimate interest to investigate a crime or a violation of laws or regulations and/or our own legitimate interest to enforce the user agreement and ensure your compliance therewith.</p>		
<p><b>Retention period:</b> During the term of the user agreement and for 2 years thereafter as well as for the time necessary to comply with any legal obligation or to establish, exercise or defend legal claims.</p>		

Purpose	Processing activities	Categories of personal data
Reporting to Biluthyrarna Sverige	– Reporting to Biluthyrarna Sverige's information list containing information regarding breaches against conditions for usage of car rental- vehicles and causing of damages to rented vehicles	<ul style="list-style-type: none"> <li>– Name</li> <li>– Personal identity number</li> <li>– Reasons for reporting, see further in section 6(g).</li> </ul>
<p><b>Legal basis:</b> <i>Public interest alternatively legitimate interest.</i> This processing is necessary in order to carry out a task of public interest. Credit information business is regarded as a task of public interest and our reporting is a prerequisite for Biluthyrarna Sverige to be able to maintain such information list. This processing is further necessary to meet our and other car rental service providers' legitimate interest to establish, exercise or defend legal claims.</p>		
<p><b>Retention period:</b> Supporting information is stored until the information has been published by Biluthyrarna Sverige and is screened within 72 hours from reporting.</p>		

Purpose	Processing activities	Categories of personal data
Enforcing the user agreement and detecting and preventing misuse of the Service	– Retaining information regarding any breach by you of the user agreement	– Name – Personal identity number – E-mail address – Phone number – Information regarding any breach of the user agreement
<b>Legal basis:</b> <i>Legitimate interest</i> . This processing is necessary to meet our legitimate interest to enforce the user agreement and detect and prevent misuse of our services and our terms and condition.		
<b>Retention period:</b> During the user agreement and 2 years thereafter.		

Purpose	Processing activities	Categories of personal data
Evaluating, developing and improving our services	– On an occasional basis, comparing our customer list with the customer list of third party suppliers of services that could be of interest for us and our customers to be offered in connection with our services. Such comparison will solely be made to identify the number of people that are customers of both us and such third party. The information will not be shared with the third party for any other purpose.	– E-mail address
<b>Legal basis:</b> <i>Legitimate interest</i> . Processing is necessary to meet our legitimate interest to explore the possibility of combining our services with third party services that could be of interest for our customers and enhance the user experience.		
<b>Retention period:</b> The information will be de-identified after comparison.		

### 3. CONSENT

We obtain your consent for the purposes set forth in the table above. We will not carry out any processing of your personal data for such purposes without your prior voluntarily given consent. Your consent is voluntary and can always be revoked, for instance by contacting us via the contact information provided in section 13.

### 4. COLLECTION OF PERSONAL DATA

We process personal data collected directly from you as well as from third parties, including but not limited to from the following sources.

#### 4.1 Online

We collect personal data from the following online sources.

- (a) Our websites.
- (b) Our mobile apps.
- (c) Technology integrated in our vehicles, equipment technology or via telematics.
- (d) Our official social network pages.
- (e) Your device's web browser.
- (f) Third party social network pages.

#### **4.2 Offline**

We collect personal data from following offline sources.

- (a) Calls to or from our customer support, emergency road side assistance, customer contact or member care centers.
- (b) In connection with a reservation (including an abandoned or interrupted reservation).
- (c) When you register your user account.
- (d) Transactions you complete with us, including options you make, charges you incur and any incidents or accidents that may occur.
- (e) Claims management service providers (either affiliated directly with us, or operated by a third party).

#### **4.3 Other sources**

We also obtain personal data from the following sources.

- (a) Companies within our group in case you have provided information to such company in connection with your application to use the Service.
- (b) Your employer (if your employer has a customer agreement with us).
- (c) Credit information companies and banks.
- (d) Insurance companies.
- (e) Public records, Swedish Transport Agency's Record of Road Traffic, SPAR.
- (f) Biluthyrarna Sverige – Only a "Yes" is obtained regarding whether you are on the list. See further below in section 6(g).

### **5. WHAT HAPPENS IF YOU DO NOT PROVIDE US WITH YOUR PERSONAL DATA?**

Some of the personal data you provide to us is necessary for us to be able to fulfil our obligations pursuant to the user agreement that you enter into with us. If you choose not to provide certain personal data, we will not be able to fulfil our obligations and we are forced to decline your user account and consequently the rental of vehicles. We will inform you of what personal data is required when asking you to provide your personal data.

### **6. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?**

In order to fulfil the purposes listed above, and pursuant to what is stated below, we may share your personal data with the following recipients.

- (a) Disclosure to our group companies: We may share your personal data with companies within the same group as us for the purposes set out in this policy.
- (b) Disclosure to companies you use: We may share your personal data with companies you use in connection with your rental, including your credit card provider and other companies that process your charges.

- (c) Protective and legal uses: We may use, share and disclose your personal data for legal reasons as we believe necessary or appropriate, including to:
- (i) comply with applicable law and legal processes;
  - (ii) process, handle or otherwise respond to claims for damages, including for bodily injury or property damage;
  - (iii) recover our vehicles or any monies due, e.g. debt collection agencies;
  - (iv) respond to requests from public and government authorities;
  - (v) enforce our terms and conditions;
  - (vi) protect our rights, privacy, safety or property, and/or that of our subsidiaries, you or others;
  - (vii) protect our operations and those of any of our subsidiaries; and
  - (viii) allow us to pursue available remedies or limit the damages that we may sustain.
- (d) Emergency assistance: We may share your personal data with emergency services providers, such as law enforcement, roadside assistance providers, and ambulance providers, in order to deliver related services.
- (e) Disclosure to our service providers and agents: We may use other companies as our service providers or agents to act on our behalf and assist us in the conduct of our business, performing services for us under our instruction. These services may include hosting certain websites or databases, carrying out data analysis and conducting customer satisfaction surveys or other research. We will seek to require our service providers and agents to maintain appropriate security standards to protect your personal data and use the personal data we provide to them only for the purposes we specify.
- (f) Disclosure for corporate transactions: We may disclose your personal data to a third party in connection with any contemplated or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- (g) Disclosure to Biluthyrarna Sverige: In the cases described below, information is reported to Biluthyrarna Sverige's information list. We will transfer your personal data (name, address, personal identity number, as well as the basis for the reporting in the form of a code) to Biluthyrarna Sverige who will process the data in the information list as well as give access to the information to its members being car rental companies with recommendations not to rent out vehicles to listed individuals. The basis for the reporting apply to if you i) do not return the vehicle after the rental period, ii) do not pay your parking tickets, iii) do not pay your rental fee or other payments, iv) misuse the vehicle, v) are reported to the police for unauthorized use, or vi) without permission hand over the vehicle to another driver. The purpose of the transmission of the personal data to Biluthyrarna Sverige's information list is to reduce the risk of damage and expenses for us, for member car rental companies and, in the long term perspective, for the public. The information list is kept with permission from the Swedish Data Protection Authority (*Sw. Datainspektionen*). In connection with the personal data being registered in the information list, a letter is sent to the data subject being registered with information regarding the registration as well as the purpose of the registration and that the data

will be stored for 24 months by Biluthyrarna Sverige. For more information regarding how Biluthyrarna Sverige processes your personal data, please see <http://www.biluthyrarna.se>.

- (h) Disclosure to insurance companies: We may share your personal data with insurance companies in order to investigate and settle matters relating accidents and damages to our vehicles during your use of the Service.

## **7. WILL WE TRANSFER YOUR PERSONAL DATA OUTSIDE OF THE EU/EEA?**

We may transfer your personal data to countries outside the EU/EEA. If the EU commission has not decided that a country that your personal data is transferred to ensures an adequate level of protection for your personal data we will impose adequate security measures to ensure that your personal data is protected in a sufficient way, regardless of what country the personal data is transferred to. These security measures include where the recipient i) is in a country with adequate level of protection, ii) enters into agreement regarding the EU commissions Standard Contractual clauses, or iii) is connected to Privacy Shield.

For information regarding whether we have transferred your personal data to a country outside of the EU/EEA, what countries we have transferred your personal data to as well as what security measures that have been implemented, please contact us by sending a written request to us via the contact information listed in section 13.

## **8. SECURITY**

### **8.1 Security measures**

We store and access personal data in various locations and cloud services. Servers that store information for us are primarily located in Sweden and Europe, although storage may occur in other locations as well. We use reasonable administrative, technical and organizational measures (a) to safeguard personal data against loss, theft, unauthorized use, disclosure, or modification, and (b) to ensure the integrity of your personal data. To help us protect your privacy, you should maintain the secrecy of any user-IDs and passwords, membership numbers, or other identifiers or credentials you may have set up or were provided with in connection with your participation in or use of our products, services, or websites.

### **8.2 Transmissions**

As you may be aware, there is no completely secure method of transmitting or storing data. There are risks related to all kinds of transmission (such as loss, fault, monitoring and misuse of transferred data) due to the different ways to transmit are different from each other (e.g. postal mail, text messages, faxes, and transfers via the Internet or wireless networks). If you have reason to believe that any account with us is no longer secure, you must immediately contact us.

We try to strike a balance between the security of your data and your convenience. As a result, we may sometimes use a method of communication that is less secure than a less convenient alternative. For example, we may send you an e-mail or a text message in unencrypted form (i.e. instantly readable) because many of our customers are unable to access encrypted (i.e. coded) e-mail or messages. This means that our message, if misrouted or intercepted, could be read more easily than encrypted messages. Such messages may contain personal data. Please do not include confidential information, such as your credit card number or account passwords, in any e-mail or text you send to us or on any posting you make to a public area of a third-party social network page, especially since any such posting immediately becomes public. For a more secure way to communicate with us over the Internet, please see our contact information in our app.

### **8.3 Access**

We restrict access to our employees and providers who need to use it in order to process it on our behalf, and who are contractually by law required to keep your personal data secure and confidential. We aim to choose the option for data processing that best safeguards the integrity of your personal data toward any third party.

### **9. THIRD PARTY SERVICES AND APPS**

When using our vehicles, you may access applications and other services linked with the vehicle but provided by a third party, which may, for example, require transmission of location data and other vehicle-recorded data to this third party. Neither we nor any of our group companies are responsible for the collection or use of personal data in applications or services provided by a third party, and recommends that you carefully review applicable terms for (and any privacy policy related to) such applications or services before you use them. If you have questions concerning a certain third party use of your personal data, please contact the third party directly. We also recommend looking for privacy choices and controls in third party applications after downloading.

### **10. COOKIES**

In general, you can visit our websites without telling us who you are or revealing any information about yourself. However, to be able to provide you with certain services or offerings, we often need to record certain items of personal data, such as your name and e-mail address. We may also collect (by means of cookies) anonymous information on how you have used our websites prior to such recording. This information will be helpful to us in order to improve our websites or marketing. All our websites open to our customers include information concerning our use of cookies. For certain countries there is also an online procedure for accepting or declining cookies. For more information regarding our use of cookies, please our cookie policy published at [www.m.co](http://www.m.co).

Our webpages are not directed to individuals below 13 years of age, and we do not knowingly collect personal data from such individuals.

### **11. AUTOMATED DECISION-MAKING INCLUDING PROFILING**

Sometimes we use automated decision-making. It can e.g. be an automated rejection of a reservation. Usage of automated decision-making could for instance mean that you do not have the possibility to reserve certain vehicles based on your age or any vehicle based on your credit rating which you have provided or we which have obtained electronically without personal contact. This information is relevant since we made a risk assessment implying that it is not commercially desirable to rent out certain categories of vehicles to people under a certain age or with a low credit rating.

You have the right not to be subject to a decision based solely on any form of automated decision-making, including profiling, if the decision may have legal consequences for you or in a significant way affects you in any other way. However, we have the right to use automated decision-making if it is necessary for entering into or performance of an agreement between you and us or if you have given consent to the processing. You have the right to personal contact with us which means that you can contact us via the contact information provided in section 13 to express your opinion and oppose the decision.

### **12. WHAT RIGHTS DO YOU HAVE?**

Below is a summary of the rights you have in relation to our processing of your personal data. The exercise of these rights is free of charge and you may exercise the rights by contacting us via the contact information provided in section 13. Do not hesitate to contact us if you have any questions regarding your rights.

Please note that we will always make an assessment of a request to exercise a right to determine whether the request is valid. All rights listed below are not absolute and exceptions may apply.

In addition to the rights set forth below, you always have the right to lodge a complaint with the Swedish Data Protection Agency ([www.datainspektionen.se](http://www.datainspektionen.se)) regarding our processing of your personal data.

- (a) **Right of access.** You are upon request entitled to receive a copy of your personal data that we process and also to obtain supplementary information about our processing of your personal data.
- (b) **Right to rectification.** You have the right to have your personal data corrected and/or completed if it is inaccurate and/or incomplete.
- (c) **Right to erasure.** You have the right to request that we erase your personal data without undue delay where:
  - the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - you withdraw your consent to a processing activity and there is no other legal basis for the processing;
  - you make a valid objection to the processing of your personal data;
  - the personal data has been unlawfully processed; or
  - the personal data has to be erased for compliance with a legal obligation.
- (d) **Right to restrict processing.** You have the right to request restriction of the processing of your personal data where:
  - the accuracy of the personal data is under examination;
  - the processing is unlawful or is no longer needed for the purposes of the processing but you oppose the erasure of personal data and request restriction instead;
  - we no longer need the personal data but you need the personal data for the establishment, exercise or defense of legal claims; or
  - you have objected to the processing of your personal data and such objection is under verification.
- (e) **Right to data portability.** Under certain circumstances you have the right to receive the personal data concerning you which you have provided to us in order to transmit such data to another service provider if the processing of the personal data is based on your consent or the performance of an agreement.
- (f) **General right to object.** You have the general right to, at any time, object to the processing of your personal data that is based on our legitimate interests. If you object, we have to demonstrate that we have compelling legitimate grounds for such processing or that we need the personal data for the establishment, exercise or defense of legal claims. You also have the right to object to automated decision-making (including profiling) under certain circumstances.
- (g) **Right to object to direct marketing.** You have a right to, at any time, object to the processing of your personal data for direct marketing purposes. If you do this, we may no longer process your personal data for such purposes.

### 13. CONTACT

You may contact us through our app or the following communication channels:

M Mobility Services Sweden Production

Jakobsbergsgatan 17  
111 44 Stockholm  
Sweden  
[help@m.co](mailto:help@m.co)

**14. AMENDMENTS TO THIS PRIVACY POLICY**

We may, at any time and for any reason, make amendments to this privacy policy by publishing the updated version of the privacy policy on our website or on applicable mobile applications or other websites. The updated privacy policy will be applicable with immediate effect upon publication, however it will not apply retroactively. Upon making a significant change to this privacy policy, we will state the date for such update on the first page of this policy and provide information with regard thereto on our websites, by e-mail or in our app.

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