

## PRIVACY POLICY

This policy describes how car2go NA, LLC and car2go Canada Ltd. (collectively, "SHARE NOW" or "we" or "us") collect, use, and share personal information. This policy applies to your use of any SHARE NOW service, including use of our websites (e.g. share-now.com and car2go.com), our mobile app, our membership application process and program, and the use of our vehicles and other transportation products (collectively referred to as "vehicles"). This privacy policy is intended only for users and members located in the US and Canada.

### Consent

When you provide us with your personal information and other data, you consent and agree to our use and disclosure of the information as permitted by applicable law and consistent with this privacy policy. We collect personal data directly from you by phone, fax, or email, social media, through your use of our services, website, and app, or through your use of our vehicles.

### Types of Data We Collect

Personal information is information that allows someone to identify or contact you. Non-personal information is information that does not directly identify you. We collect both types of information about you.

The following provides examples of the types of data that we collect about you, including through our app, and how we use that information:

<b>Source of Information</b>	<b>Types of Data</b>	<b>Purpose for Collection and Use of Data</b>
Membership Registration	We collect the information you provide us in your membership application so that we can begin providing you services, verify your eligibility for membership, and verify your ability to pay for our services.	We collect this information to better provide services to our members.
Demographic Information	We may collect personal information from you, such as your age, gender, or location so that we can tailor our services to you.	We use this information to provide tailored services to our users.
Email Interconnectivity	If you receive emails from us, we may use certain tools to capture data relating to when you open our message, click on any links or banners it contains, and whether you then navigate to our site.	We use this information to understand how our users interact with our emails.
Employment	If you apply for a job posting or become an employee, we may collect personal information necessary to process your application, sign you up for benefits, and process payroll. This may include, among other things, your Social Security number, your bank account number, and	We use information about current employees to ensure efficient staffing and workforce operations.

	your name, date of birth, address, and telephone number.	
Feedback/Support	If you provide us or our third-party contact center feedback or contact us or our third-party contact center for support by email or telephone, we will collect your name and email address or telephone number, other personal information, as well as any other content that you send or provide to us in order to reply. We may also record our conversation with you. If you provide us feedback or contact us for support by or through social media sites, we will collect your social media handle or user name, email address, and any other content that you send or provide to us in order to reply.	We use this information to understand and respond to your feedback or issues.
In-App Chat	If you engage in a discussion with our third-party contact center and/or member services team using the in-app chat feature, we will collect any information you provide to us as part of that discussion, including your name, email address, and telephone number.	We use this information to ensure in-app chat operates efficiently.
Location Information	GPS software (both original to the vehicle and supplemental), geo-filtering, and other location-aware technologies locate you, or make assumptions about your location, in order to deliver or restrict content based on your location, locate and monitor our assets, and improve our technology. Further, If you have enabled GPS or use other location-based features on your device, you and/or the vehicle location may be tracked. Further, as concerning GPS in our vehicle, we may at any time during your rental track your trip and the route you take. Such information concerning the start, end, and route of your trips may be compiled, made anonymous, aggregated, and provided to third-parties. We also track where you park our vehicles and where you end your trip. We may use such information to advise when a vehicle is parked in a	We use this information to ensure our product functions efficiently and in compliance with relevant laws.

	restricted parking area or in an area that may soon become restricted.	
Mailing Lists	When you sign up for one of our mailing lists, we may collect your email address or postal address to complete mailings. In addition, we may purchase mailing lists from third parties for marketing purposes, which may contain individual names and addresses or email addresses.	We use this information to help expand our customer base.
Mobile Devices	We may collect information from your mobile device, such as unique identifying information broadcast from your device when visiting our website or opening our mobile app. We may also collect your device's unique identifying number.	We use this information to understand how users utilize our app.
Billing Information	We may collect your name, billing address, shipping address, email address, phone number, and payment card information when you sign up for a membership and during the course of your membership should any information change.	We use this information to process payments.
Partner Promotion	We may collect information that you provide as part of a co-branded promotion with another company.	We use this information to fulfill promotions.
Surveys	When you participate in a survey we may collect additional information that you provide through the survey. If the survey is provided by a third-party service provider, the third-party's privacy policy applies to the collection, use, and disclosure of your information. For surveys that we conduct, we may use the information you provide and give anonymized data to cities, states, and other agencies or municipalities for them to evaluate the business and transportation patterns, needs, and uses. Others surveys are conducted for member service steering, operations improvements, product improvements, marketing segmentation and targeting, determining information about our members, including how and where they consume information,	We use this information to help understand user feedback.

Sweepstakes	When you participate in a sweepstakes or contest we may collect information about you, which includes contact information to notify you if you are selected.	We use this information to run our sweepstakes or contests.
Third-Party Tracking	We participate in behavior-based advertising. This means that a third party may use technology (e.g., a cookie (further described below)) to collect information about your use of our website so that they can provide advertising about products and services tailored to your interests. That advertising may appear either on our websites, or on other websites. You can opt-out of receiving advertising based upon your browsing behavior from some network advertising companies by going to the Network Advertising Initiative and the Digital Advertising Alliance websites, although to completely prevent advertising based upon your browsing behavior you should also disable cookies on your browser.	We use this information to help understand our advertisements or analytics.
Web Logs	We may collect information from you, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to your computer when you use the Internet), a domain name, embedded scripts, click-activity, referring website, and/or a date/time stamp for your visit.	We use this information to help us understand how users utilize our website.
Cookies	We may use cookies, similar software tools such as HTML5 Storage, Local Shared Objects, and clear GIFs (together referred to as "cookies"). Cookies are small pieces of information that a website sends to your device while you are viewing a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your device until you delete them). Among other things, cookies allow us to provide you with a more personal and interactive experience tailored to your interests and to improve our marketing efforts. Persistent cookies may be removed by	We use this information to help our website run smoothly.

	<p>following instructions provided by your browser. If you choose to disable cookies some areas or features of our website may not work properly. We use cookies to identify your interests and particularly popular areas of our websites. We use this information to improve the design of our websites and to make them even more user-friendly. For the same purposes, we use the analysis tools Adobe Analytics and Optimizely, which may involve the use of cookies.</p>	
<p>Vehicle Specific Information</p>	<p>We collect identifiable information about your driving habits. SHARE NOW may employ vehicle electronic trip data collection, including electronic and real-time connections to the vehicles' internal systems (including the vehicle's Event Data Recorder and Airbag Control Module), as well as electronic hardware and software. This may provide functions such as vehicle location, GPS location information, fuel level, speed, travel times, and personal information used to calculate and/or verify invoices, maintenance, vehicle operation, vehicle security, "harsh" driving events or inputs, and safety. This data may be used for various purposes, including preventing fraudulent usage of our vehicles, vehicle theft, and/or issuing fines for late returns and other uses outside the boundaries of the vehicle reservation, and is required to use our vehicle. This data may also be used and accessed in the event of an accident involving one of our vehicles in connection with a law enforcement inquiry or investigation, insurance claim, damage investigation, or lawsuit. Summarized data and reports may also be provided to cities. For transfer of liability for certain infractions and tickets (e.g. parking, speeding, and traffic tickets), we will send personal member information to cities. Further we may also install a camera (inward and/or outward facing), motion</p>	<p>We use this information to help monitor and protect the use of our assets.</p>

	detector, smoke detector, and sound recorder to protect the security of our assets, ensure the integrity of the fleet, and maintain our fleet.	
Recorded Driving Information	As part of the normal course of your membership and use of SHARE NOW's services and vehicles, we may have access to, and collect, personal information about you from traffic tickets, electronic highway toll systems, parking lot tickets, and other data systems located through our internal systems and devices onboard our vehicles. We collect this information to monitor the safe, lawful, and agreed-upon use of our vehicles.	We use this information to help monitor the use of our assets and ensure business functionality.
Recorded Phone Calls	We may also record telephone conversations between third-party-contact center, insurance provider, and SHARE NOW and members in connection with memberships in claims and insurance, to resolve member issues, in order to clear up legal issues, and/or to improve the quality of vehicles and services.	We use this information to ensure quality response to customer phone calls.
Device Recognition Technologies	SHARE NOW uses device recognition technologies, including application of statistical probability to data sets, as well as linking a common unique identifier to different device use (e.g., Facebook ID), which attempts to recognize or make assumptions about users and devices (e.g., that a user of multiple devices is the same user or household).	We use this information to provide tailored services to our customers.
In-App Tracking Methods	SHARE NOW may use tracking technologies that use device or other identifiers to associate app user activity to a particular app and to track user activity across apps and devices.	We use this information to provide tailored services to our customers.
App Push Notifications	We may try to engage in communications with you using push notifications. These notifications may include alerts, sounds, vibrations, and icon pages. If you use an Apple device, you will receive a request to opt in to receiving these push notifications. If you	We use this information to efficiently communicate with our customers.

	use an Android device, you will automatically receive push notifications. If you wish to stop receiving them, you can do so by going to "Settings," clicking on "Sound & notification" and then clicking on the "App notifications" link.	
Identity Verification Provider	We may collect identifiable information from our identity verification provider and/or carsharing protection list. This information may include names, driver license information and photographs, credit card information and photographs, photographs of you, and social security numbers of individuals.	We use this information to confirm the identity of our customers and employees, and their ability to drive and work.
Customer Relationship Management Tools	We may collect identifiable information from customer relationship management databases. This information may include the names, address, telephone numbers, or email addresses of potential customers.	We use this information to help build our customer base and manage our relationship with you.
Insurance Provider	We may collect identifiable information from insurance providers. This information may include the names, addresses, telephone numbers, email addresses, and driving records of customers.	We use this information to help process insurance claims related to our assets.
Collections Agency	We may collect identifiable information from collections agencies. This information may include the names, addresses, telephone numbers, email addresses, and financial information of customers.	We use this information to collect payment on our customer accounts.
Subrogation Agency	We may collect identifiable information from subrogation agencies. This information may include the names, addresses, telephone numbers, email addresses, and financial information of customers.	We use this information to obtain reimbursement for insurance losses.
Marketing Agency & Survey Tool, Media Buy Agency	We may collect identifiable information from marketing and advertising agencies. This information may include the names, email addresses, and other information of potential customers.	We use this information to help build our customer base and perform marketing activities.
Payment Verification and Processing	We may collect identifiable information from our payment processor. This	We use this information to process payments, fulfill order

	information may include the names, email addresses, addresses, banking information, and transaction information of our customers.	from our customers, and protect against fraud.
Our Affiliated Companies	We may collect identifiable information from our affiliated companies. This information may include the names and email addresses of their customers.	We use this information to help us understand the customer base of our affiliates.

In addition to the information that we collect from you directly, we may also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources.

**Use and Processing of Your Information**

In addition to the uses described above, we use your personal information in the following ways:

- To verify your ability to drive.
- To improve the content of our website and mobile application.
- To customize the content and/or layout of the website and mobile application for you.
- To process payments.
- To notify users about updates to our website, mobile app, services, terms of service, or vehicles.
- To contact you for marketing purposes.
- To share with our affiliates to help them contact users for marketing purposes.
- To maintain the vehicles.
- To develop future products and services.
- To provide software updates.
- To provide connected vehicle technologies and services.
- To protect the safety of you and others.
- To conduct analytics.
- To respond to your inquiries related to support, employment opportunities, or other requests.
- For internal administrative purposes.
- To communicate with you about matters of importance.
- To investigate accidents, claims, or lawsuits, or assist with law enforcement inquiries or investigations
- To maintain our fleet
- To improve our member experience

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose.

**Sharing of Personal Data**

In addition to the specific situations discussed elsewhere in this policy, we disclose personal information in the following situations:

**Affiliates and Acquisitions:** We may share your personal information with our corporate affiliates, parents, and subsidiaries. If another company acquires our company, business, or our assets, we will also share your personal information with that company.



**Other Disclosures with Your Consent:** We may ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this policy.

**Other Disclosures without Your Consent:** We may disclose personal information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your personal information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, injury to a person, or a violation of our policies, or to comply with your request for the shipment of products to or the provision of services by a third party intermediary.

**Public:** Our website, social media pages, and mobile app provide the opportunity to post content in a public area of our website or mobile app. If you decide to submit information on these pages, that information may be publicly available.

**Partner Promotion:** We may offer contests, sweepstakes, or other promotions with third party partners. If you decide to enter a contest, sweepstakes, or promotion that is sponsored by a third party partner the information that you provide will be shared with us and with them. Their use of your information is not governed by this privacy policy.

**Service Providers:** We may share your personal information with service providers. Among other things, service providers may help us to administer our website, conduct surveys, collect and process payments, provide technical support, provide vehicle support and service, provide member support, provide auto insurance and administer claims, and assist in the processing of memberships.

## **Your Choices**

You can make the following choices regarding your personal data:

**Promotional emails:** You may be opted in or choose to provide us with your email address for the purpose of allowing us to send free newsletters, surveys, offers, and other promotional materials to you, as well as targeted offers from third parties. You can stop receiving promotional emails by following the unsubscribe instructions in emails that you receive. Although we will remove your name from our mailing list after receiving your request within the timeframe permitted by law, you may still receive mailings from us that had been initiated prior to your name being removed. If you decide not to receive promotional emails, we may still send you operational and transactional communications, such as those about your account, to fulfill orders you have made, to ask you to rate the product you purchased, or other service-related communications.

**Promotional Mailings:** If at any time you do not want to receive offers and/or circulars from us you can remove yourself from our mailing lists by emailing us (our contact information is below) with your request, along with your name, address, and zip code. Please note that our mailings are prepared in advance of their being sent. Although we will remove your name from our mailing list after receiving your request, you may still receive mailings from us that had been initiated prior to your name being removed.

**Changes to Your Personal Information:** When reasonable and commercially practicable, upon notice, SHARE NOW will correct any inaccuracies in your personal information. Personal information may also be accessed and edited by you or through the mobile app or making a request using the "Contact Information" below.

**Deletion of Your Personal Data:** Typically we retain your personal information for the period necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or permitted by law. You may, however, request that we delete your personal information. All requests must be directed to the contact in the "Contact Information" section below. We may also decide to delete your data if we believe that the data is incomplete, inaccurate, or that our continued use and storage are contrary to our obligations to other individuals or third parties. When we delete personal information it will be removed from our active database, but it may remain in archives where it is not practical or possible to delete it. In addition, we may keep your personal information as needed to comply with our legal obligations, resolve disputes, close claims, and/or enforce any of our agreements.

**Revocation of Consent:** In order to provide our services to you, where possible, we rely on your consent to the processing of personal information that you submit to us. If you revoke your consent for the processing of personal information then we may no longer be able to provide you services. In some cases, we may limit or deny your request to revoke consent if the law permits or requires us to do so, or if we are unable to adequately verify your identity. You may revoke consent to processing (where such processing is based upon consent) by contacting us at the address described below.

**Access to Your Personal Information:** You may request access to your personal information by contacting us at the address described below. If required by law, upon request, we will grant you reasonable access to the personal information that we have about you. Note that California residents may be entitled to ask us for a notice describing what categories of personal information (if any) we share with third parties or affiliates for direct marketing.

**Objection to Certain Processing.** You may object to our use of your personal information by contacting us at the address described below. For example, California or Nevada residents may be entitled to object, or opt-out, of having their information sold to third parties. If you are a California or Nevada resident and would like to opt-out of having your personal information sold, please visit the following link: [Do Not Sell My Personal Information](#). We do not discriminate against California or Nevada consumers who exercise any of the rights described in this policy.

**Online Tracking:** We do not currently recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.

**Mobile App:** You can stop all collection of data generated by use of the app by uninstalling the app. You may be able to adjust certain privacy features by adjusting the permissions in your mobile device and/or the app's settings. Note that uninstalling or adjusting settings in the mobile app will limit our ability to provide our services to you.

**California Residents:** California residents may be entitled to ask us for a notice describing what categories of personal information (if any) we share with third parties or affiliates for direct marketing purposes, the sources of that collection, and what the legitimate purpose of collection is. If you are a California resident and would like a copy of such notice, please submit a written request to us using the "Contact Information" section below.

**Canadian Residents:** Canadian residents may be entitled to ask us what personal information we collected about them, how it is or has been used, including any organizations to whom it has been disclosed, and obtain access to their information.

## **How We Protect Personal Information**

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. We ask that any affiliates or service providers to whom we transmit your personal information provide the same or equal protection of user data as provided by SHARE NOW. In the event that we are required by law to inform you of any unauthorized access to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Our website and application permits you to create an account. When you do you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

## **Miscellaneous**

The following additional information relates to our privacy practices:

**Transmission of Data to Other Countries:** SHARE NOW operates in the U.S. and Canada, and the information we collect is governed by applicable US and Canadian law. If you are accessing our website or mobile app from outside the US or Canada, please be aware that information collected through the site or app may be transferred to, processed, stored, and used in the US, Canada, and/or Europe. These laws may be different from those in your country of residence. Additionally, the servers and some service providers used by SHARE NOW are located within Europe and the United States. As a result, your information may be processed in a foreign country where privacy laws may be less stringent than the laws in your country. Nonetheless, where possible, we take steps to treat personal information using the same privacy principles that apply in the country in which we first received your information. By submitting your personal information to us, you agree to the transfer, storage, and processing of your information in a country other than your country of residence, including, but not necessarily limited to, the United States. If you would like more information concerning our attempts to apply the privacy principles applicable in one jurisdiction to data when it is transferred to another jurisdiction, you can contact us using the information in the "Contact Information" section below.

**Third Party Applications/Websites:** We have no control over the privacy practices of websites or applications that we do not own.

**Minors:** SHARE NOW is not intended for use by individuals under the age of 18.

**Canadian Privacy Rights:** If you are a resident of Canada, the Personal Information Protection and Electronic Documents Act ("PIPED") is a federal Canadian law that applies to SHARE NOW's operations in Canada. PIPED regulates the collection, use, and handling of personal information. If you are located in Alberta, British Columbia, Ontario, or Quebec, provincial privacy laws may also apply to our handling of your personal information.

**Changes to This Privacy Policy:** We may change our privacy policy and practices over time. We will notify you before such changes are made.

**Information for California Residents:** California Civil Code 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether certain categories of information are "sold" or transferred for an organization's "business purpose" as those terms are defined under California law. You can find a list of the categories of information that we share in the sharing disclosure statement below. Please note that because this list is comprehensive it may refer to types of information that we share about people other than yours. If you would like more information concerning the categories of personal information (if any) we share with third parties or affiliates for those parties to use for direct marketing please submit a written request to us using the information in the "Contact Information" section below.

**Contact Information:** If you have any questions, comments, or complaints concerning our privacy practices, please contact us at the address below. We will attempt, where practical, to respond to your request and provide you with additional privacy-related information.

Email: [NAprivacy@share-now.com](mailto:NAprivacy@share-now.com)

Mail: SHARE NOW  
General Counsel  
901 E. 6th street, Suite 100  
Austin, Texas 78702

We can also be reached through the mobile app.

This privacy policy is effective as of November 12, 2019.

## California Information Sharing Disclosure

California Civil Code 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicates that companies should disclose whether the following categories of information are collected, transferred for consideration, or transferred for an organization’s “business purpose” as that term is defined under California law. Note that while a category may be marked that does not necessarily mean that we have information in that category about you. For example, while we transfer bank account numbers for our business purpose in paying our employees (e.g., direct deposit) we do not collect or transfer bank account numbers of individuals that submit questions on our website’s “contact us” page.

Category of Personal Information	Is information collected by us?	Is information transferred for valuable consideration?	Is information transferred for business purposes?
Audio, electronic, visual, thermal, olfactory, or similar information	✓	<input type="checkbox"/>	✓
Bank account number	✓	<input type="checkbox"/>	✓
Biometric information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Characteristics of protected classifications (e.g., age, sex, race, ethnicity, physical or mental handicap, etc.)	✓	<input type="checkbox"/>	✓
Commercial information (e.g., products or services purchased, or other purchasing or consuming histories or tendencies)	✓	<input type="checkbox"/>	✓
Credit card number	✓	<input type="checkbox"/>	✓
Debit card number	✓	<input type="checkbox"/>	✓
Driver’s License Number / State ID	✓	<input type="checkbox"/>	✓
Education	✓	<input type="checkbox"/>	✓
Electronic network activity (e.g., browsing history)	✓	<input type="checkbox"/>	✓
Email address	✓	<input type="checkbox"/>	✓
Employment	✓	<input type="checkbox"/>	✓
Employment history	✓	<input type="checkbox"/>	✓
Geolocation data	✓	<input type="checkbox"/>	✓
Health insurance information	✓	<input type="checkbox"/>	✓
Identifiers (e.g., name or alias)	✓	<input type="checkbox"/>	✓

Insurance Policy Number	✓	<input type="checkbox"/>	✓
Medical information	✓	<input type="checkbox"/>	✓
Online identifier (e.g. IP address)	✓	<input type="checkbox"/>	✓
Other financial information	✓	<input type="checkbox"/>	✓
Passport Number	✓	<input type="checkbox"/>	✓
Physical Characteristics	✓	<input type="checkbox"/>	✓
Postal address	✓	<input type="checkbox"/>	✓
Signature	✓	<input type="checkbox"/>	✓
Social Security Number	✓	<input type="checkbox"/>	✓
Telephone Number	✓	<input type="checkbox"/>	✓
Transaction information	✓	<input type="checkbox"/>	✓