

PRIVACY POLICY

1. BASIC INFORMATION

Data Controller	CARSHARING MOBILITY SERVICES S.L.
Purposes of processing	Lawful basis for processing
Management of Service Users, Service provision and, in general, management, development and compliance with the established relationship	-Performance of contract
Transactional management of the service	-Performance of contract
Customer and consumer service	-Performance of contract
Profiling with internal sources	-Legitimate interest
Development of profiles and / or predictive models (data analysis operations with internal and external sources)	- Consent of data subject
Compliance with legal obligations related to the Service	- Compliance with legal obligations
Marketing communications	- Legitimate interest
Marketing communications of third parties	- Consent of data subject
Management of promotions	-Performance of established legal relationship (promotional relationship)
Geolocation	- Performance of contract

Fraud prevention	- Legitimate interest
Receivers	<ul style="list-style-type: none"> - Public administrations. - Acquirers, successors or assignees of our company. - Insurance companies. - Financial entities - Payment gateways - Contracting entities if the service is provided under one of these contracts
Rights of data subjects	Access, rectification, erasure, restriction of processing, opposition, portability, opposition to automated individual decisions and revocation of consent
Additional information	Additional and detailed information regarding the processing of personal data is provided below.

2. ADDITIONAL INFORMATION

This Privacy Policy regulates the processing of data collected by CARSHARING MOBILITY SERVICES S.L. (hereinafter, the Company) through the Application (hereinafter, the App) and/or the Website within the framework of the provision of the rental service by minutes of multiuser vehicles (carsharing) within an operational area, subject to the availability of the vehicles, offered by the Company (hereinafter, the Service). This Policy is an integral part of the General Conditions of Use. The Company recommends that the User carefully read our Privacy Policy.

The User guarantees that the information provided is true, accurate, complete and up-to-date, and is responsible for any direct or indirect damage or loss that may be caused as a consequence of the breach of such obligation. When the User provides personal data relating to third parties, he/she guarantees that he/she has informed them of the content of this Privacy Policy and that he has obtained their prior consent to provide us with their personal data.

Regarding the personal data requested through the enabled forms in the App, it will be necessary for the User to provide, at least, those marked with an asterisk, since, if these data deemed necessary are not supplied, the Company will not be able to accept and manage their request.

The Company may modify this Privacy Policy when necessary. If the Privacy Policy is changed, we will notify you through the App, our website or any other means of communication to ensure that you are informed of the new privacy terms applicable

to the Company's Services. If you continue making use of the Services after we have informed you of the changes introduced in our Privacy Policy, this will mean that you agree to the new terms, except for the purposes for which you express consent is required.

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

Data controller identity: **CARSHARING MOBILITY SERVICES S.L.**

NIF: **B87908513**

Address: **Calle Quintanavides, 21 - Building 5 - Parque Empresarial -, 28050, Madrid (Spain)**

Phone: **+34 91 150 11 18**

Email: hola@zitycar.es

Delegado de Protección de Datos (DPD): dpd@ferrovial.com / **C/Príncipe de Vergara 135, 28002 de Madrid (España).**

For what purpose do we process the personal data of the user?

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

- 1. User management:** Provision, management, optimization, personalization and monitoring of the Service; as well as assistance to the User. Identification of the user and verification of compliance with the requirements necessary for the rental of vehicles without a driver.
- 2. Transactional management:** Management of charges, payments, non-payments, billing, damages, accidents and administrative infractions, as well as control and prevention of fraud. And, in general, any type of transactional management required for the provision of the service.

In connection with the management of the Service's payment gateway, the data may be transferred internationally to a data processor located in the USA (PayPal, Inc.), which provides appropriate contractual guarantees on the basis of European regulations. If you choose the option of saving your payment (card) data, we inform you that these will be kept and will be self-completed in subsequent leases, so that you will not have to enter your payment data in each new process, and they will be understood to be valid and in force for subsequent leases. The card security code (CVV or CVC) will only be used for the current lease. The User may modify or delete his/her cards at any time through the My Account - Payments and Promotions section.

- 3. Customer and consumer service:** Attention to requests, complaints, suggestions or claims related to the provision of Carsharing services.

- 4. Profiling with internal sources:** In order to provide personalized marketing communications tailored to User needs, preferences and personal circumstances, the Company may collect information about the use of the Carsharing Services by a User, exclusively with internal data, as well as analyze the characteristics or behavior patterns of the User, with the purpose of performing segmentation of Users for predictive or evaluative purposes.

Profiling with data from internal sources can include the execution of operations that allow the optimization of the provision of Carsharing Services and the improvement of their quality.

- 5. Profiling and/or predictive modelling (data analysis operations with internal and external sources):** Subject to Users' Consent, the Company may carry out data analysis and analysis operations in relation to the activity of the users, as well as profiling with internal and external data, in order to improve the quality of the Service, including the development of predictive and mobility models.
- 6. Compliance with the Company's legal obligations in relation to the Carsharing Services:** Compliance with the Company's legal obligations in relation to the Carsharing Services, whenever it is necessary to process the data of the Users.
- 7. Marketing communications:** The Company may send own marketing communications to the Users, in order to promote the use of the Service and share contents related to the Carsharing Services.
- 8. Third Parties Marketing Communications:** Subject to Users' consent, the Company may send marketing communications from third parties, in order to promote products and/or services of third parties related to the following sectors of activity: manufacturing industry; supply of electric energy, gas, steam and air conditioning; wholesale and retail trade, repair of motor vehicles and motorcycles; transport and storage; hotel business; information and communications; financial and insurance activities; professional, scientific and technical activities; administrative and auxiliary services; health and social services activities and artistic, recreational and entertainment activities.
- 9. Management of promotions:** Management of promotions and the participation of the Users in them, including providing the User with information on the promotional activity in question and compliance with the Company's legal obligations arising from the development of the promotional actions.
- 10. Geolocation:** In order to provide Carsharing services, the Company may require the use of geolocation data from Users.
- 11. Fraud prevention:** Management and development of fraud prevention and control activities.

What personal data do we process?

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

- Personal data provided by Users through the forms made available by the Company.
- Personal data obtained as a consequence of the use of the Services by the Users.

In particular, the Company may process personal data of the following types:

- **Identification data and data with personal characteristics** (e.g. name and surname, driving license, e-mail address, postal address, telephone number, IP address, etc.).
- **Data related to the use of the carsharing services** (e.g. date and time of use of the carsharing service, incidents, etc.).
- **Other types of personal data, which may be subject to the prior consent of Users** (e.g. analytical data, biometric data, preferences, etc.).

What other recipients will the data be disclosed to?

The Company informs you that your data may be communicated to the following entities:

- Agencia Tributaria (Tax Agency) and other competent administrations, for compliance with tax obligations.
- Competent public administration, for the identification of drivers in compliance with applicable regulations.
- Other public administrations and / or competent authorities, such as State Security Forces and Corps, as long as is necessary and/or as required by applicable regulations.
- To entities belonging to the "Zity Empresas" service so that they can verify the provision of the contracted service, when the user accesses the Carsharing service within the framework of one of these contracts.
- Financial institutions and payment gateways, for the management of collections and payments.
- Auxiliary or third party service entities, such as those dedicated to the provision of identification services for possible urban parking spaces in relation to the user's location, for which the user must have requested the provision of the service from said third party entities.
- Insurance entities, for the management of damages and / or accidents.

Likewise, the Company informs users that personal data may be communicated to service providers of the Company who act as data processors, some of which are located outside the European Economic Area in countries that do not have a level equivalent to the European one in terms of data protection guarantees.

In the event that the Company carries out such data communications, it guarantees that, beforehand, it has put in place the appropriate means to ensure the application of adequate legal guarantees in relation to such data communications.

The appropriate legal guarantees to be applied by the Company may consist in the formalization with the recipient of the data of Standard Contract Clauses approved by the European Commission to legitimize the international transfer of data to third countries or in the adherence of the service provider to the protection framework for the transfer of data EU-US and Switzerland-US, called Privacy Shield (<https://www.privacyshield.gov/welcome>), among others.

If Users wish to obtain more information about data transfers carried out by the Company and the legal guarantees that protect them, they may contact us through the contact channels indicated in this Privacy Policy.

What is the legitimacy for processing your personal data?

The Company carries out the processing of Users' personal data in accordance with the following lawful bases for processing, depending on the type of personal data provided, as well as the interactions established between the user and the Company:

- The **execution of the contract or the established legal relationship** established between the Company and Users.
- Compliance with **legal obligations of the Company** (such as those provided for in tax regulations and traffic regulations), in relation to the processing and possible transfer of data to administrations and competent authorities.
- The **legitimate interest** of the Company in relation to the processing of data relating to the sending of its own commercial communications, the profiling of Users with internal sources or the prevention of fraud.
- The **User's consent**, in relation to the processing of data relating to the sending of marketing communications from third parties and data analysis operations (predictive models, mobility projects) with data from internal and external sources.

The Company informs its Users that it will only process personal data for processing activities based on the User's consent in cases where the User has consented to the data processing activity in question, through the means of obtaining consent made available by the Company.

How long do we retain your personal data?

Your personal data will be kept as long as the legal relationship established between the Company and the User remains in force and for the period of time necessary to comply with the Company's legal obligations.

In relation to the rest of the processing purposes, the data will be kept as long as the Company has the legitimacy to do so and as long as the User does not request the deletion of the data.

What are your rights as data subject?

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

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

The User may request the right to the **portability of the data** and obtain for himself/herself or for another service provider certain information derived from the formalized relationship with the Company.

To exercise the data protection rights, or revoke the consents provided, the User can write to CAR SHARING MOBILITY SERVICES, S.L., Servicio de Atención al Usuario, C/ Francisco Sancha, 42-44, 28034 de Madrid, indicating as reference "Data Protection".

Also, the User may revoke their consent or express their opposition in relation to the processing and/or transfer of their data for commercial purposes, for the analysis and development of mobility projects or for the preparation of driving profiles and/or predictive models by sending an email to the following email address: hola@zitycar.es.

The Company informs the User that in order to make the right exercised effective, it may be necessary for the User to provide additional documentation to prove his/her identity (e.g. a copy of his/her national identity card or passport).

For any additional information on the processing of personal data, the User may contact the Company's Data Protection Officer (dpd@ferrovial.com or C / Príncipe de Vergara 135, 28002, Madrid, Spain). Likewise, the User may file a complaint with the Spanish Data Protection Agency (<http://www.aepd.es>), especially when the User has not obtained satisfaction in the exercise of his or her rights.