

PRIVACY POLICY

1. Basic information

Data Controller	CARSHARING MOBILITY SERVICES S.L.	
Purposes		legitimacy
	Management of Service Users, Service provision and, in general, management, development and compliance with the established relationship	- Execution of the contract or the legal relationship established - Consent of the data subject (processing of biometric and location data)
	Management of the service platform and payment gateway	- Execution of the contract or the legal relationship established - Consent of the data subject (data transfer to the USA)
	Analysis and development of mobility projects	- Consent of the data subject
	Development of profiles and / or predictive models	- Consent of the data subject
	Carrying out advertising and commercial prospecting activities	- Consent of the data subject
	Compliance with legal obligations related to the Service	- Compliance with legal obligations
Receivers	Public administrations and competent authorities Financial institutions, insurers and payment gateways Group companies to which the partners of the Company belong Third companies Data Processors located in the USA	
Rights	Access, rectify and delete the data, as well as other rights, as explained in the Additional Information	
Additional information	Consult the section with Additional and Detailed Information on Data Protection	

2. Additional information

This Privacy Policy regulates the processing of data collected by CARSHARING MOBILITY SERVICES S.L. (hereinafter, the COMPANY) through the Application, the Website and / or 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 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.

Regarding the personal data requested through the enabled forms, 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 .

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

Data controller identity: CARSHARING MOBILITY SERVICES S.L. CIF: B87908513

Address: Servicio de Atención al Usuario, C/ Francisco Sancha, 42-44, 28034 de Madrid

Phone: 91 150 11 18

Email: hola@zitycar.es

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

The personal data collected through the Application, the Website and / or within the framework of the provision of the Service will be incorporated into files owned by the COMPANY in order to enable the management of the Users of the Service, the provision of the Service and, in general, the management, development and fulfilment of the relationship established between the COMPANY and the Users.

In greater detail, the COMPANY may process your data with the following purposes:

- User registration and 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 necessary requirements for the rental of vehicles without a driver.
- Management of charges, payments, non-payments, billing, damages, accidents and administrative infractions, as well as control and prevention of fraud.
- Attention to requests, complaints, suggestions or claims.
- Analysis and development of mobility projects.
- Development of driving profiles and / or predictive models, in order to optimize the Service, customize advertising activities and commercial prospection and enable the hiring of additional coverage in the insurance of the Service.
- Management of the service platform, within which the data can be transferred internationally to a US-based processor (Ridecell, Inc.), which provides appropriate contractual guarantees based on European regulations.
- Management of the service payment gateway, within which the data can be transferred internationally to a US-based processor (PayPal, Inc.), which provides appropriate contractual guarantees based on European regulations.

In the event that the user chooses the option to save their payment information (card), we inform you that it will be preserved and will appear auto-completed in subsequent rents, so it will not be necessary to enter your payment information in each new process, and it will be considered valid for subsequent leases. The security code of the card (CVV or CVC) will only be used to make the rent in progress. The User can modify or delete their cards at any time through the section Account- Payments and Promotions.

- Carrying out advertising and commercial prospecting activities such as the development of statistics or satisfaction and market studies; profiling and personalization of commercial actions; the segmentation and filtering of data; as well as referral through any channel, including electronic means (such as notifications through the Application, e-mail and SMS, MMS to the mobile phone) and by non-electronic means (including, as an example and not limitation, telephone and letter), commercial information, offers, discounts and promotions related to (i) own products and services and (ii) products and services of companies of the group to which the Company's constituent partners belong (iii) of third companies belonging to the following sectors of activity: manufacturing industry; supply of electricity, gas, steam and air conditioning; wholesale and retail sale, repair of motor vehicles and motorcycles; transportation and storage; hostelry; information and communications; financial and insurance activities; Professional, scientific and technical activities; administrative activities and auxiliary services; health and social services activities and artistic, recreational and entertainment activities. The companies of the Ferrovial Group are all those companies or entities that are part of that group for the purposes of article 42 of the Spanish Commercial Code and, specifically, the companies listed in the report of the latest consolidated annual accounts published on the website www.ferrovial.com. The Ferrovial Group companies are mainly engaged in the following activities: (I) construction, (ii) management of transportation infrastructure and airports, (iii) real estate and (iv) services. They are companies of the Renault Group, all those companies or entities that appear listed in the link: [https://www.renault.es/descubre-renault/grupo-renault-espana/#Empresas del Grupo y resultados](https://www.renault.es/descubre-renault/grupo-renault-espana/#Empresas_del_Grupo_y_resultados). The Renault Group companies are mainly engaged in the following activities (i) manufacturing, (ii) marketing and distribution of vehicles and spare parts.
- Compliance with legal obligations related to the Service, such as those provided for in tax regulations and traffic regulations.

Additionally we inform you about the possible processing of data of users of social networks through the corporate profiles of the COMPANY with the purposes allowed in each social network, including analytical purposes. The organization of contests and / or promotions in these networks will be regulated in a specific way.

2.3 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.
- Financial institutions and payment gateways, for the management of collections and payments.
- Insurance entities, for the management of damages and / or accidents.
- Companies of the group to which the constituent partners of the COMPANY belong and third companies, identified in the previous section, for the realization of advertising and commercial prospecting activities, as well as for the analysis and development of mobility projects.
- Data controllers located in the USA, who provide appropriate contractual guarantees based on European regulations (Decision 2010/87 / EU), for the management of the platform and the payment gateway of the Service.

2.4 What is the legitimacy for processing your personal data?

The legal basis of the processing and / or assignments of data that have just been exposed is based on:

- The execution of the contract or the established legal relationship.
- The consent of the User, in relation to the processing of biometric data and location, necessary for the identification of the User and the subsequent provision of the Service.
- The consent of the User, in relation to the international transfer of the data to Data Processors located in the USA, necessary for the management of the platform and the payment gateway of the Service.
- The consent of the User, in relation to the processing and/or transfer of data for the analysis and development of mobility projects; advertising and commercial prospecting activities; as well as for the preparation of profiles and/or predictive models, without the withdrawal of these consents conditioning the provision of the Services.
- Compliance with legal obligations (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.

2.5 How long do we retain your personal data?

The data will be kept as long as the established legal relationship is maintained, during the years necessary to comply with the legal obligations and, in relation to the rest of the processing purposes, as long as its deletion is not requested by the User. Notwithstanding the foregoing, in the event that the User does not use the Service for 12 months, it will proceed to unsubscribe, after warning about it.

2.6 What are your rights as data subject?

The User has the right to access their personal data, as well as to request the rectification of inaccurate data or, where appropriate, request its deletion when, among other reasons, the data is no longer necessary for the purposes that were collected.

Under certain circumstances, data subjects may (i) request the limitation of the processing of their data, in which case we will only keep them for the exercise or defense of claims (ii) oppose 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.

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 User may submit a claim to the Spanish Data Protection Agency (<http://www.agpd.es>), especially when he has not obtained satisfaction in the exercise of his rights.