

PRIVACY POLICY

1. BASIC INFORMATION

Data Controller	CARSHARING MOBILITY SERVICES, S.L.	
Processing purposes	Legal basis for processing	
User's registration in App and management of the platform that supports the App.	Performance of contract.	
Management of the App.	Performance of contract.	
Centralized customer management and provision of the App Services.	Performance of contract.	
Customer service.	Performance of contract.	
Fraud prevention.	Legitimate interest.	
Management of promotions.	Performance of established legal relationship (promotional relationship).	
Data anonymization.	Legitimate interest and compliance with legal obligations.	
Data analysis (with internal and external sources).	Consent of data subject.	
Marketing communications.	Legitimate interest.	
Third party marketing communications.	Consent of data subject.	
Profiling with internal sources.	Legitimate interest.	
Geolocation.	Performance of contract.	
Compliance with legal obligations suitable to ZITY related to the App Services.	Compliance with legal obligations.	

Recipients	<ul style="list-style-type: none"> - Local Operators. - Competent public administrations. - Acquirers, successors, or assignees of our company. - Insurance companies.
Data Subject Rights	Access, rectification, erasure, limitation of processing, opposition, portability, opposition to individual automated decisions and revoke consent.
Additional Information	See below additional information regarding data processing.

2. ADDITIONAL INFORMATION REGARDING DATA PROTECTION

CARSHARING MOBILITY SERVICES, S.L. (hereafter, “ZITY”) makes available to all the Users of the ZITY mobile App (hereafter, the “App”) the following Privacy Policy, with the objective of providing information on how we process your personal data and protect your privacy. ZITY recommends the User to read carefully our Privacy Policy.

Introduction

This Privacy Policy regulates the processing of personal data collected by ZITY through the App, and / or in the framework of the provision of the App Services (hereinafter “App Services”) as described in the [CAR LESSOR Terms and Conditions](#). The related carsharing services will be provided by the Local Operators (hereinafter “Local Operators”) and may be subject to specific Terms and Conditions of Use and Privacy Policies.

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

Regarding the personal data requested through the forms enabled in the App, it will be necessary for the User to provide, at least, those marked as obligatory, since, if these data deemed necessary are not provided, ZITY will not be able to accept and manage your request.

ZITY may modify this Privacy Policy whenever this may be necessary. In case the said Policy is modified, we will communicate this to you through the App, our website or through any other communication means, in order to make sure you are informed of the new privacy terms applicable to the App Services. If you continue making use of the App 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 your express consent is required.

Who is the data controller?

Company name: **CARSHARING MOBILITY SERVICES S.L.**

Registered tax number: **B87908513**

Registered offices: **Francisco Sancha, 42-44, 28034, Madrid (Spain)**

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

Email: hola@zity.eco

Data Protection Officer (DPO): dpd@ferroviol.com / **C/Príncipe de Vergara 135, 28002 de Madrid (Spain).**

For what purposes do we process your personal data?

The personal data you provide us may be processed by ZITY for any of the following purposes, according to the type of data that is provided by the User, as well as the interactions that the user performs via the App:

1. **Users' registration in App and management of the platform that supports the App:** Use of the App Services is conditional on the prior registration of the User in the App and, for some functionalities, on the delivery of the relevant documents, together with acceptance of the App Terms and Conditions of Use and the Privacy Policy.
2. **Management of the App:** The use of the App may imply the processing of certain technical information regarding Users' mobile or other digital device, to enable its functioning, as well as for incident management.
3. **Centralized customer management and provision of the App Services:** ZITY enables Users to take advantage of the carsharing services provided by Local Operators from different locations through centralized customer management.
4. **Customer service:** ZITY will make available a customer service center for the Users regarding the use of the App Services.
5. **Fraud prevention:** Management and development of control activities and fraud prevention.
6. **Management of promotions:** Management of promotions and the participations of Users, as well as to provide information about the promotion activity to the Users and comply with ZITY legal obligations derived from promotions.
7. **Data anonymization:** ZITY can anonymize Users' personal data to comply with legal obligations regarding security measures and to elaborate reports regarding the functioning of the carsharing service, market research studies and profitability studies based on anonymized data, to increase the knowledge about the use of ZITY services and improve the App Services.
8. **Data analysis (with internal and external sources):** Subject to Users' consent, ZITY may perform analysis of the Users' activity and profile elaboration with internal and external data to improve the quality of the App Services, including the elaboration of predictive and mobility models.
9. **Marketing communications:** ZITY may send marketing communications to the Users to promote the use of the App and share content related with the App Services.
10. **Third party marketing communications:** Subject to Users' consent, ZITY may send marketing communications to the Users in order to promote third party products and/or services related to the following sectors of activity: manufacturing industry; supply of electricity, gas, steam and air conditioning; wholesale and retail trade, repair of motor vehicles and motorcycles; transport 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.
11. **Profiling with internal sources:** In order to provide personalized marketing communications tailored to Users' needs, preferences and personal circumstances, ZITY may gather information from the use of the App Services

about a User only with internal data and analyze his/her characteristics or behavior patterns in order to place them into a certain category or group, and/or to make predictions or assessments about them.

12. Profiling with internal data may include operations for enabling the provision of the App Services and improve the quality of the latter.
13. **Geolocation:** To provide the App Services as well as to facilitate the provision of the carsharing services by the Local Operators, ZITY may require the Users' geolocation data.
14. **Compliance with legal obligations suitable to ZITY related to the App Services:** Fulfilment of ZITY's legal obligations related to the App Services and that require the use of Users' data.

Origin of personal data processed by ZITY and how it is obtained?

The personal data processed by ZITY because of the interactions made by Users through with the App come from the following sources:

- Personal data provided by the Users using the forms made available by ZITY to enable registration and use of the App and App Services or any other form.
- Personal data gathered from the use of the App by the Users.
- Personal data communicated by the Local Operators necessary for the performance of the carsharing services.

In particular, ZITY may process and receive the following categories of data from the Local Operators:

- **Identification and personal characteristics data** (such as name and surname, driver's license, e-mail address, postal address, telephone number, IP direction, etc.).
- **Data related to the use of the carsharing services** (such as date and time of use of the carsharing service, incidents etc.)
- **Other types of personal data**, that may be subject to Users' previous consent (such as analytics, biometric data, preferences etc.)

What is ZITY's legitimacy for processing your personal data?

ZITY processes the Users' personal data in accordance to the following legal basis, depending on the type of personal data provided, as well as the interactions established between the User and ZITY:

- The **performance of the contract or the legal relationship** established between ZITY and the Users, including for processing the Users' geolocation data.
- **Compliance with legal obligations** (such as those provided in the tax regulations and traffic regulations), in relation to the processing and possible transfer of data to administrations and competent authorities.
- **Legitimate interest**, in relation to fraud prevention, ZITY's marketing communications, profiling with internal sources and data anonymization.
- The **consent of the User**, in relation to the performance of advertising and commercial prospecting activities regarding third party products and services as well as data analysis with internal and external sources.

ZITY hereby informs that it will only perform the processing of personal data for the processing activities based on consent when the User has consented to a specific processing activity, through the means of obtaining consent made available by ZITY.

How we disclose your personal data?

The personal data collected by ZITY through the App may be communicated to the following recipients, according to the legal basis of the communication:

- Local Operators in order to render the carsharing service and related service such as invoicing.
- Competent public administrations, for the fulfillment of tax obligations and for the identification of drivers in compliance with applicable regulations, among others.
- Acquirers, successors, or assignees of our company as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, or in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.
- Insurance companies.

We also inform that we may transfer your personal data to service providers acting as data processors, some of which are located in countries outside of the European Economic Area, whose laws may not provide the same level of data protection.

When we do so, we will ensure that there are adequate safeguards in place to protect your personal data that comply with our legal obligations. The adequate safeguard might be a data transfer agreement with the recipient based on standard contractual clauses approved by the European Commission for transfers of personal data to third countries or the adherence by the service provider to the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks (<https://www.privacyshield.gov/welcome>), among others.

For more information about the transfers described above and the adequate safeguards we use to protect such transfers, you may contact us through the contact information set forth in this Privacy Policy.

For how long we keep your data?

Your personal data will be kept as long as the established legal relationship is maintained and during the term necessary to comply with ZITY's legal obligations.

In relation to the rest of the processing purposes your personal data will be kept always and when ZITY has a legitimate basis and until the User requires its erasure.

What are your rights on your personal data?

The Users have the right to **access** their personal data and obtain confirmation on how these data are being processed, 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 that were collected.

In certain circumstances, the user may request the **limitation of the processing** of their data, in which case we will only keep them for the exercise or defense of claims. The User also may **oppose** to the processing of their data and based on reasons related to their situation, in which case we will stop processing the personal data in question, except for compelling legitimate reasons or for the exercise or defense of claims.

The User can request the right to **data portability** and obtain for his or herself or for another service provider certain information derived from the relationship formalized with ZITY.

The User also has the right **not to be subject to a decision based solely on automated processing, including profiling**, which produces legal effects concerning him or her or similarly significantly affects him or her.

Finally, the User can **withdraw his or her consent** at any time, in the case the consent has been granted for a specific purpose, without affecting the legality of the data processing based on the consent prior its withdrawal.

We remind the User that he/she can **object**, at any time, to the processing of his or her personal data with **commercial or promotional purposes**.

To exercise the described rights or revoke the consents given, the User can contact CARSHARING MOBILITY SERVICES, SL, User Service, C / Francisco Sancha, 42-44, 28034 of Madrid, indicating as reference "Data Protection" or by sending an email to the following email address: hola@zitycar.es.

We inform you that in order to make effective the exercised right, we may require you to provide additional documentation in order to prove your identity (for example a copy of your national ID card or passport).

For any additional information regarding processing of personal data, the User may contact the ZITY Data Protection Officer (dpd@ferrovial.com or C / Príncipe de Vergara 135, 28002 of Madrid, Spain) or submit a claim to the Spanish Data Protection Agency (<http://www.aepd.es>), especially when the User has not obtained satisfaction in the exercise of his/hers rights.