

Privacy Statement
MyWheels B.V.

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Privacy Statement

1. Who are we and what do we offer?

We are MyWheels B.V. (**MyWheels**), part of The Sharing Group N.V.. MyWheels offers car-sharing services, a convenient alternative to car ownership for both individuals and organizations (**Car Sharing Services**). Users can reserve vehicles through an easy-to-use app (**MyWheels App**) and have access to a variety of cars in fixed parking spaces or designated parking zones. The Car Sharing Services, the MyWheels App and all related services are collectively referred to as our **Services**.

2. Privacy Statement

This is our **privacy statement**. In this document, we explain the types of Personal Data we collect and process in the provision of our Services and for what purposes. We also explain our role in the processing of Personal Data, how long we retain Personal Data, and your rights as a data subject.

3. Personal Data and Controller

We process **Personal Data**. Personal data is any information that can be used to directly or indirectly identify an individual. Under the European General Data Protection Regulation (**GDPR**), we are the so-called Controller. If you have any questions about the processing of your Personal Data, you can always contact us using the contact details at the bottom of this Privacy Statement.

4. What Personal Data do we collect?

When you are a **User** of our Services and we are the Controller, we process your Personal Data when you download the MyWheels App and create an account, when you reserve a car through the MyWheels App and when you drive our cars. Our in-car hardware detects your driving behaviour, which is used as input for our algorithm (**CARMA**) that predicts and prevents dangerous situations on the road and damage to our cars. You can find more information about CARMA below and in our [CARMA FAQ document](#).

We may also process your Personal Data in a general context, for example through our website and social media accounts (**General**). We describe this in more detail below.

If you are a **User**, we may process the following Personal Data:

Personal data	Goal(s)	Legal basis
1. When you create an account on the MyWheels App: - first and last name; - address; - date of birth; - email address; - your Facebook, Google or Apple UID if you log in via Facebook, Google or Apple; - telephone number; - IP address; - Browsers, OS data, and unique behavioral signals such as typing cadence and copy-paste behavior;- the device used to log in; - IBAN/BIC, transaction amounts, time and location of	We process this Personal Data: - to register your account; - to know and control who has access to our MyWheels App; - to send you invoices and manage our payment administration; - to assess the risk of default and to assess whether you are a reliable payer and do not engage in fraudulent behaviour; and for analyses and research activities aimed at optimising our services and decision-making.	We process this Personal Data on the basis of our legitimate interest to assess your request and provide you with access to our Services and to perform our contract with you. We process Personal Data for analytics and research activities

transactions, previously failed or successful payments, name of the bank account holder and invoices; - behaviour on the platform, such as the pages visited, the duration of your visit and the search filters used; - profile picture (optional); and - Business name (if you're using a shared business account).		because we have a legitimate interest in continuing to improve our Services and making important business decisions.
<i>2. When you reserve a car via the MyWheels App:</i> - your driving licence details: first and last name, your driving licence number, country and institution of issue, place and date of birth, and expiry date; - all accounts to which you are linked as an additional director; - all accounts linked to your account as an additional director; - trip details: the location of the car before, during and after driving, start time, end time, trip duration and distance; - your OV-chipkaart number (if linked); - your reservations and any notes related to these reservations; - traffic fines that we receive from the municipality and the CJIB in connection with your parking and driving behaviour.	<i>We process this Personal Data to:</i> - give you access to the MyWheels App; - check whether you are authorised to drive ; - make reservations via the MyWheels App possible for you; - allow you to add other directors to your account and so that you can be added to accounts of other directors; - allow you to pay or object to traffic fines ; - forward your travel details to your employer to enable them to comply with their legal (tax) obligations; - to take action against you if you breach our terms and conditions; and - for analyses and research activities aimed at optimising our services and decision-making.	We process this Personal Data data to perform our contract with you and on the basis of our legitimate interest to assess your fitness to drive a car. We process your travel data based on of our legitimate interests, to direct roadside assistance to your location. Traffic fines can contain data on criminal offences. In that context, we rely on the exemption of art. 10 GDPR in combination with art. 32 (d) of the Dutch GDPR Implementation Act, as the processing of this data is necessary to establish, exercise or defend legal claims against you. We process this Personal Data for analysis and research activities because we have a legitimate interest in

		continuing to improve our Services and making important business decisions.
3. When you drive a car via MyWheels, we detect your driving behavior via third-party hardware (INVERS) installed in the car. This hardware detects the following: - hard braking (number of exceedances above the set threshold and average power during hard braking); - hard acceleration (number of exceedances above the set threshold and average power during hard acceleration); - sharp cornering (number of exceedances per kilometer driven above set threshold and average power during sharp cornering); and - speeding (number of exceedances above the threshold and the exceeded exceeded the limit).	We process this Personal Data to: - in the event of excessive speeding (depending on the speed limit of the road being driven), to take measures. More specifically, we reserve the right to immediately block the User and/or the account in accordance with the applicable MyWheels terms and conditions . This speeding data is not used as input for CARMA; and - to use the hard braking, hard acceleration, sharp cornering and hard driving (excluding excessive speeding), as part of our CARMA algorithm (see Target 4), to predict the likelihood of dangerous situations and damage occurring during future journeys.	We collect and process the Personal Data via the hardware in the car because it is necessary for MyWheels' legitimate business purposes, namely to keep the Car Sharing Services insurable by proactively ensuring road safety and preventing damage through real-time collected data on car usage. For the performance of our agreement with you, it is specifically necessary to process excessive speeding because in such a case we have the right to block and exclude you from our Services.

4. The following types of Personal Data are processed for CARMA: - <u>input data</u>: See the data listed under the purpose 3 mentioned above. However, within CARMA, the actual exceeding of the speed limit is not used as input, but only the percentage above the driven limit; - <u>model</u>: CARMA is trained on the basis of anonymous historical driving behaviour data from accounts that have been banned from driving in the past and accounts that have not been banned; - <u>output data</u>: CARMA produces a risk score based on the input data and the algorithm's model. This risk score is an indicator for MyWheels to determine what actions should be taken against the User (i.e. doing nothing or blocking or warning the User). Any risk score indicating an action against a User will be verified at all times by a MyWheels employee; - <u>correspondence with the User</u>: an email or text message sent to the User with information about the reason for the decision (warning or blocking) and information on how to appeal the decision and any further correspondence about the decision or objection.	We process this Personal Data for the following purposes: - MyWheels has designed CARMA to be able to predict the likelihood of dangerous situations and damage during future rides caused by a specific User. CARMA is specifically aimed at proactively warning or blocking Users who receive a high risk score, meaning that they can cause dangerous situations on the road or damage, preventing MyWheels from offering reliable and safe Car Sharing Services in the future ; - a MyWheels employee always monitors the output and input of CARMA in order to verify the risk score produced by CARMA and to decide whether actual action should be taken against the User (human supervision); - if a User objects to the decision, MyWheels will use the Personal Data to verify and possibly correct the outcome of CARMA and the decision taken against the User ; - MyWheels further processes the Personal Data to train and test CARMA and to develop and improve its Services.	We process the Personal Data data via the in-car hardware within CARMA as this is necessary for MyWheels' legitimate business purposes, namely to keep the Car Sharing Services insurable by proactively ensuring road safety and preventing damage through real-time collected data on car usage. We also process the Personal Data for our legitimate business purposes in order to continuously improve CARMA, in connection with the purposes described above. MyWheels has conducted a Fundamental Rights and Data Protection Impact Assessment (DP-FRIA) to assess and mitigate any risks associated with the use of artificial intelligence to support our decisions to block or warn Users. More information, including your right to object to CARMA, can be found here. Please note that in your case, we may believe that our mandatory justified outweigh
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		your rights and interests, which means that you have not exercised your right to object to the use of CARMA. We will always assess this carefully, on a case-by-case basis.
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We may process Personal Data in **general** as follows:

Personal data	Goal(s)	Legal basis
<i>Technical information:</i> - information about your device type, browser type, date and time of the session, IP address and browser type; and - cookies.	<i>We process this Personal Data to:</i> - communicate in the same language as the browser; - adapt our website to the device used; - enable you to use our website; and - improve the usability of our website	We process this Personal Data because we have a legitimate interest in doing so, namely to provide you with a well-functioning website and to improve our Services for our users.
<i>Via our social media pages:</i> - data of visitors who leave a comment or otherwise post something on our social media pages, including the Personal Data contained in such comments and/or posts.	<i>We use this information to:</i> - contact the visitors in response to their message and/or comment via our social media pages; and - To process the feedback left on our social media pages.	We process this Personal Data because we have a legitimate interest in responding to your input, using it to improve our Services, and because the visitors have voluntarily disclosed such information. Our social media pages are also managed by the platforms themselves. Please refer to these privacy statements to see how each social medium handles personal data.
<i>If you contact us:</i> - your name; - contact details; and - the content of the correspondence.	<i>We use this information to:</i> - answer your questions and/or handle any complaints; - support you in using our Services; and - Improve our Services in response to your questions and feedback.	We process this Personal Data because we have a legitimate interest in contacting you and helping you based on your comment or question and to improve our Services in response to your questions and feedback we have received.

<i>If you sign up for our newsletters:</i> - name and surname; - e-mailadres; in - which links in our newsletter you click on.	<i>We use this information to:</i> - send you our newsletter and keep you informed about all our (future) Services; and - optimize our Services.	We process this Personal Data if you have given us permission to do so (by subscribing to the newsletter). We can track the clicks in our newsletter because we have a legitimate interest in analyzing how our newsletter is received and optimizing our Services. Each newsletter contains a link with which you can unsubscribe.
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5. From whom do we receive your Personal Data?

Most Personal Data is obtained directly from you, but some Personal Data is received from other parties:

- INVERS GmbH (**INVERS**) manages the hardware installed in our cars that detects your driving behaviour (data on speeding, hard braking, hard acceleration and sharp cornering). INVERS acts as a Processor on our behalf, see section 6.
- The Central Judicial Collection Agency (**CJIB**) and municipalities provide us with the fines that Users receive while driving or parking the MyWheels cars. We will forward these fines to you (or your employer) if our records show that the car was driven using your account.
- Crimimail provides us with information such as payment risk in name, but also about bankruptcies and guardianship.
- Adyen provides us with information such as named payment risk.

6. Do we share your Personal Data with others?

Processors

We work with third parties who process Personal Data on our behalf (**Processors**). By doing so, we remain responsible for ensuring the protection of your Personal Data during that processing. These Processors may only use or disclose the data collected and processed by us or on our behalf as part of our instructions to them and in no case for any other purpose. We enter into a data processing agreement with all our Processors. We have currently engaged the following processors:

- INVERS: the company that operates the in-car hardware for detecting driving behaviour.
- Snowflake: A Dublin-based company that manages our servers.
- MessageBird: A Netherlands-based text messaging company. All text messages you receive from MyWheels regarding reservations are sent through MessageBird's servers.
- Payment service providers: companies (such as Adyen) that process (iDEAL) payments, payments made by us and direct debits.
- CrimiMail: a company based in the Netherlands that provides information about people who use MyWheels. Crimimail makes risk assessments for non-payment, fraud and embezzlement.
- Google Cloud: the cloud computing platform where MyWheels hosts its servers and databases and stores all files securely.

- ChangeCX: when you contact the support department of MyWheels, ChangeCX answers the phone. ChangeCX is a Netherlands-based customer service outsourcing company.
- Onfido: Identification and verification platform that helps validate your identity.
- TSG Operations: this is a company that, like us, is part of The Sharing Group and that supports us in the preparation of reports, statistics and analyses for our management.
- Marketing software: we use the software tools of MailChimp, LinkedIn, Google and Facebook for marketing purposes.
- Coeo: a debt collection agency with which we share Personal Data of the account holder in the event of unpaid invoices.
- Appjection: a company that processes traffic and parking fines, transferring MyWheels' responsibility and payment obligations to the account holder. This service reduces the legal, administrative, and financial burden associated with fines.
- Planhat: a customer success platform that helps us manage and grow customer relationships by centralizing data, automating workflows, and providing actionable insights.
- Intercom: a customer communication platform that uses MyWheels to manage support tickets, live chat, push notifications, and in-app messaging.
- De Beelen Mobility: a company that manages part of our fleet, which includes the maintenance and repair of vehicles.
- The Big Data Company: we share aggregated data with this company for the purpose of analysis and research activities. This data may consist of Personal Data that MyWheels can trace back to you, such as your customer number. However, The Big Data Company cannot trace that Personal Data back to you.

Independent Controllers

We may also share your Personal Data with third parties who use it for their own purposes (**Independent Controllers**). Once they receive your Personal Data, it is their responsibility to protect it. To find out how these parties handle Personal Data, you can consult their privacy statements. We share Personal Data with:

- Tax authority: We are legally obliged to include (part of) the Personal Data in our financial records, which must be shared with the national tax authority.
- Suppliers: Only if this is necessary to handle the case. For example, insurers, government agencies and similar parties.
- Your employer: If you are a User and you use a shared company account, your Personal Data, i.e. all the information necessary for your employer to check the invoice and comply with tax obligations, will be shared with your employer.

Apart from the above, we only share Personal Data with third parties if we are required to do so by law, if you give your consent or if we can rely on our legitimate interests:

- the protection of our own interests or those of third parties;
- handling a lawsuit; or
- to enable us to carry out business transactions.

7. How long do we keep the Personal Data?

We will not process or store Personal Data that we do not need. We will retain Personal Data for as long as we need it for the purposes mentioned above, unless we are required by law to retain the Personal Data for a longer period. In this context, we use the following retention periods:

- User Account Information | We will retain your Personal Data for as long as your account is active on MyWheels. After you delete your account, we will retain your Personal Data for up to one year, after which we will anonymize or delete the Personal Data.

- Driving behaviour of Users, obtained via INVERS | This Personal Data is stored for a maximum of 24 months.
- Personal data used within CARMA | The algorithm only contains the Personal Data of the last 10 trips made with each account.
- Newsletters | We will retain the Personal Data used for sending newsletters until you unsubscribe from our newsletter.
- Personal data in our correspondence | This data will be stored for as long as necessary to handle your message/question/complaint and then for a period of 5 years.
- Personal data in our administration (including transaction and fraud related data) for the (tax) authorities | This data will be kept for seven (7) years, unless we are legally obliged to keep the data for a longer period.

After the expiry of the above-mentioned retention period(s), we may process and retain certain Personal Data in order to comply with legal retention obligations and/or for fraud/abuse investigations, for insurance purposes or to substantiate a (legal) claim. In such cases, we will keep the Personal Data separately and use this Personal Data only for the purposes mentioned above.

8. Transfer of Personal Data to countries outside the European Union

We may transfer Personal Data to parties outside the European Union, if one of our Processors or an Independent Controller is located outside the European Union. Personal data will only be transferred to countries and/or parties that provide an adequate level of protection in accordance with European standards, or if we have contractual safeguards in place. You can contact us if you would like to receive more information about this or if you would like a copy of the safeguards we take in this context.

9. Third-party websites

You may find advertisements or other (hyper)links on our Website that refer to websites, products and services of partners, suppliers, advertisers, sponsors, licensors or other third parties. We have no control over the content or links contained on these websites and we are not responsible for the practices of websites linked to on or from our Website. In addition, these websites, products, and services, including their content and links, may be constantly changing. These websites, products and services may have their own privacy statements, terms and conditions and customer service policies. Browsing and interacting with any other website, including websites that link to, or link from, our website, are subject to that website's terms and policies.

10. Your rights as a data subject and our contact details

If you have any questions or concerns about this Privacy Statement or your privacy, please contact us at privacy@mywheels.nl or write to:

MyWheels B.V.

P.O. Box 47
1190 AA Ouderkerk aan de Amstel

W: www.mywheels.nl

TEL: 085-7734222

Chamber of Commerce: 37133089

Would you like to contact the Data Protection Officer of MyWheels? Then you can send an e-mail to dpo@mywheels.nl

Can't work it out with us? You always have the right to lodge a complaint with a data protection supervisory authority if you believe that we are not processing your Personal

Data in accordance with the GDPR. In the Netherlands, this is the Dutch Data Protection Authority

Website: <https://www.autoriteitpersoonsgegevens.nl>

11. Changes to the Privacy Statement

The Privacy Statement may be amended from time to time. Please check our privacy statement regularly. The new privacy statement will take effect immediately after it is posted on our website. If we make any significant changes to our Privacy Notice, we will post this on our Website along with the revised Privacy Notice.