

## **Privacy Policy**

This Privacy Policy (hereinafter referred to as the Policy) applies to all information that CARSHARING SOLUTIONS, LLC (EDRPO code 44344456, location address: Paul Alexander avenue. 84, 63 Dnipro city, Ukraine, 49000) (hereinafter referred to as the Company) receives information about the User during the registration, authorization and other use of the Site, the Getmancar Application, the Getmancar Service in accordance with the Public offer contract (User and the Joining Agreement) posted on the Site and in the Getmancar Application. Expressed in accordance with the Policy, the User's consent to the processing of personal data and other information provided to the Company shall be considered simultaneously provided by the User specified in the Policy to third parties engaged by the Company to assist in execution of the Contract of public offer (User and the Joining Agreement). Use of the Site, Getmancar Application, Getmancar Service (including the User's registration, authorization) means the User's unconditional consent on the Policy and all the terms of processing of his personal data and other information specified therein. In case of disagreement with the Policy and all its terms, the User must refrain from using the Site, Getmancar Application and Getmancar Service.

### **1. Personal data and other User's information Company receives and processes**

1.1. When registering, authorizing the User and using the Site, Getmancar Application, Getmancar Service, making payments, conducting polls, sending information and advertising messages and in all other cases provided for by the Public offer contract (User and the Joining Agreement), the Company may request from the User (p. 1.1.1 Policy) and / or obtain automatically (p. 1.1.2 Policy) the following information about the User:

1.1.1. Surname, first name, patronymic, year, month, date and place of birth, sex, passport data, mobile phone number, e-mail address, registration address / actual (postal) address, login information and password for access to certain Site functions, Getmancar Application, Getmancar Service, driver's license data, information on the presence (absence) of medical contraindications to the vehicle use, biometric data (photographs), data on the place of work, positions, control information, history of Getmancar Service usage (information on the number, cost, time and order of User's requests for Getmancar Service and their payments, including data on bank account and / or bank card account), information on participation in promotions, information on newsletter subscription or support services materials, details of the bank to return the funds, as well as other personal data and information;

1.1.2. Information that is automatically transmitted to the Company during the use of the Site, Getmancar Application, Getmancar Service, using the software installed on the User's Device, including the IP address, information from the cookie and tracking bugs, information about the country and / or the city of the User, information about the Internet browser of the User (or other program that accesses the Site, Getmancar Application, Getmancar Service), access time, address of the requested page, information on the User's devices used to access the site, Getmancar Applications, Getmancar Services.

1.2. This Policy applies only to the Site, Getmancar applications, Getmancar Services. The Company does not control and is not responsible for the Sites and software of third parties to which the User may be forwarded by clicking on the links available on the Site or Getmancar Application. On other Sites of third parties the User may be requested to provide other information and also other actions may take place for which the Company is not liable.

1.3. The Company assumes that the User is an adult capable person who meets the requirements of the Public offer contract (User and the Joining Agreement), provides reliable and sufficient information and maintains this information up-to-date. The company has the right to verify the information provided by the User in accordance with the conditions of the Public offer contract (User and the Joining Agreement). In case the User provides inaccurate information, the Company has the right to suspend or cancel the registration and / or deny the User access to the Site, Getmancar Application, Getmancar Service. The Company and / or other third parties are not liable for the submission of unreliable information causing negative consequences. If the use of the Site, the Getmancar Application, Getmancar Service has been performed by an underage and / or a legally incapable person, then responsibility for such unauthorized actions will be imposed on parents, adopters and other legal representatives of an underage and / or incapable person.

## **2. The purposes of collecting and processing personal data and other User's information**

2.1. The Company uses the personal data and other information of the User for the purposes of entering into and executing the Public offer contract (User and Joining Agreement), providing additional services, improving the quality of the service, participating in the Company's promotions, surveys, studies (including but not limited to surveys, surveys organized through electronic, telephone and mobile communications), making decisions or committing other actions that produce legal consequences in relation to the User or other persons, providing the User with information about the services provided by the Company, provision of consulting services by the Company. These purposes of the use of personal data apply to all information specified in paragraph 1.1 of the Policy.

2.2. The objectives of collecting and processing personal data include without limitation the following:

2.2.1. Registration, identification, authorization of the User within the Getmancar Service;

2.2.2. Conclusion and execution of the Public offer contract (User and Joining Agreement);

2.2.3. Providing the User with the Getmancar Service, as well as any additional functionality within the Getmancar Service;

2.2.4. Processing User's requests by the Company within the Getmancar Service;

2.2.5. Analysis and research opportunities to improve the Getmancar Service;

2.2.6. Sending news and information about products, services, special offers related to the Getmancar Service;

2.2.7. Sending service messages (for example, informing about the status of car rental, recovering / changing User's login and password, etc.);

2.2.8. Prevention and detection of fraud and illegal use of the Getmancar Service;

2.2.9. Carrying out statistical and other studies based on impersonal data.

### **3. Terms, methods, procedures for processing personal data and other User's personal information**

3.1. The Company uses the personal data and other information of the User only for the purposes specified in the Policy and in accordance with the Policy.

3.2. With respect to the personal data and other information of the User, the Company respects confidentiality.

3.3. The Company will not disclose to third parties, distribute, sell or otherwise dispose of personal data and other information received, except for purposes, in ways and within the limits provided by this Policy.

3.4. The processing of the User's personal and other data is carried out by the Company in the amount necessary to achieve each of the objectives specified in Section 2 of the Policy in the following ways: collection, recording (including electronic media), systematization, accumulation, storage, marking, specifying (updating, changing), extraction, use, transfer (distribution, submitting, access), depersonalization, blocking, deletion, liquidation, cross-border transfer of personal data, image obtaining by photographing, as well as the implementation of any other actions with the User's personal data in accordance with applicable law. The Company is entitled to process personal and other data of the User both with the use of automated personal data processing facilities and without the use of automation facilities.

3.5. The Company has the right to pass the personal data provided by the User for processing (to entrust processing to the extent necessary for the Company to fulfill its obligations) to third parties, including organizations that are engaged by the Company to send information messages via e-mail / mobile operators, carry out debiting / crediting of funds from / to the bank card (s) / settlement account to credit organizations (banks), payment systems, mobile operators, courier services, postal organizations, including the cross-border transfer of the User's personal data in written or electronic form, in the cases and in the manner provided for by applicable agreements with third parties specified, the Company's rules, applicable law.

3.6. Company also has the right to pass on the personal data provided by the User to the state authorities, the court, other authorized agencies and organizations, in the cases and in the manner required in accordance with the law applicable to the Policy.

3.7. Company guarantees fair and lawful processing of the User's personal and other data in accordance with the objectives specified in Section 2 of the Policy.

3.8. Company guarantees the immediate update of the User's data in cases when provided with new data.

3.9. Consent to the processing of personal data and other data is given by the User on an unlimited basis or before the expiry of storage period of relevant information or documents containing the above information, determined in accordance with the law applicable to the Policy. At the end of this period, personal data is a subject to liquidation by the Company.

#### **4. Changing or deleting information by the User. Cancellation of consent to the personal data processing**

4.1. The User can at any time change (update, add) his personal data and other information by contacting the Company, for example, through the support service or using the contacts shown on the Site, in Getmancar Application with a request to change (update, add) the information provided by the User. Company make changes (update, add) the information provided by the User only after completing the User's identification procedure.

4.2. The User has the right to withdraw his consent to personal data processing by sending the relevant written notice to the Company at least 60 (sixty calendar) days prior to the withdrawal of consent, while the User accepts and understands that access to the Services of the Site and the Getmancar Application will not be provided by the Company from the moment when the Company has lost the ability to process the User's personal data.

#### **5. Protection of User's information**

5.1. The Company ensures of taking necessary and sufficient organizational and technical actions to protect the personal data and other information of Users from unauthorized or accidental access, liquidation, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.

#### **6. Cookies and tracking bugs**

6.1. To improve the quality of Getmancar Service, the Company may use (temporary and permanent) cookies, tracking bugs and / or other technologies for collecting non-personal data (for example, IP address, browser type and ISP data), as well as (for Users who use the Company's services through a mobile device) a unique device identifier, operating system data and coordinates in order to record the number of Users and their behavior when using Getmancar Service. To improve the User's convenience Company has the right to collect and process information on total number of transactions, pages viewed by Users, referring / source pages, platform type, date / time of information recording, the number and location of pages viewed and used (search) words. Information about cookies and tracking bugs:

6.2.1. The Cookie file is a small text file sent to the User's device browser from server used by the Company. Cookies contain information that can later be used by the Company. Browser will store this information and send it back with every User's request. Some parts of cookies can be stored only for one session and are deleted after the browser is closed. Others installed for a certain period of time are written to a special file on the hard disk and stored on the User's

device. Cookies are used to identify, track sessions (maintaining state) and store information about the User, including preferences when using Getmancar Service. Cookies used by the Company collect anonymous data only.

6.2.2. Tracking bugs file - are graphic objects integrated into web pages or e-mail messages. Tracking bugs are used for various purposes, including a number of Users reports. Tracking bugs are used by the Company to collect anonymous data only.

6.3. The Company may use cookies and tracking bugs to monitor the use of Getmancar Service, collect non-personal information about the User, store preferences and other information on the User's device in order to save the User's time required for multiple filling in the Site forms, Getmancar Applications as well as for the purpose of displaying the content during following visits to the Site and Getmancar Application. Information obtained through cookies and tracking bugs may also be used by the Company for statistical research for content updating of the Site and Getmancar Application in accordance with the preferences of the User.

6.4. The Company can provide the User with the possibility of changing settings for receiving cookies and tracking bugs in browser settings or turn them off completely; however, in this case some of the functions of Getmancar Service may not work correctly.

## **7. Making amendments in the Policy. User's consent with the Policy**

7.1. The User acknowledges and agrees that User's registration on the Site, in the Getmancar Application and the following use of the Getmancar Service and any of its functions means the User's unconditional consent with all sections of this Policy and unconditional acceptance of its conditions.

7.2 Continuing to use the Getmancar Service after any changes and / or additions to the Policy took place means User's acceptance of such changes and / or additions.

7.3. The User undertakes to regularly familiarize himself with the contents of the Policy in order to timely learn on its changes / additions.

7.4. The Company reserves the right, at its discretion, to modify and / or supplement the Policy at any time without prior and / or subsequent User notification. The new version of the Policy shall come into force from the moment of its posting on the Site and / or in Getmancar Application, unless otherwise provided by the new edition of the Policy. The current version of the Policy is always available on the Site and / or in the Getmancar Application.

## **8. Final Conditions**

8.1. The law of Ukraine shall apply to the Policy and to arising relations between Users and the Company.

8.2. By agreeing to the terms of the Policy, User agrees to the processing of personal and other data by own will and in self-interest.

8.3. Refusal to provide personal data and other information necessary for the use of the Site, Getmancar Application, Getmancar Service will lead to Company denial in providing the User with Getmancar Service.

Date of last Privacy Policy alteration