



## SNAPPCAR KEYLESS - PRIVACY POLICY

This document sets out SnappCar's privacy policy for the use of SnappCar Keyless services, which is integrated as a supplement to the SnappCar Privacy Policy, that you can find [SnappCar Privacy Policy](#).

To enable keyless rental(s), SnappCar collects certain data, such as Geo Location data. This information is requested and processed by SnappCar in order to enable you (as an owner) to offer your vehicle for keyless rental through the SnappCar platform and to enable the Renter to determine the location of the vehicle. In addition, SnappCar may store, review and analyze log file information, such as events, engine/ vehicle diagnostics, status, location and speed, for fraud detection and prevention.

### **Data processing – Legal basis & purpose**

In the event of you are a renter, the processing of your personal data is necessary for the purposes of the legitimate interests pursued by SnappCar, namely to facilitate the keyless rent(al) of the vehicle between renters and owners, enable locating the vehicle and to detect and prevent fraud (including protection of platform and users, against misbehaviour/ abuse/ fraud and other criminal activity).

With respect to owners, the processing of the personal data is based on consent; by entering into the Keyless Owner Agreement (and have the keyless equipment installed in the vehicle), the Owner consents to the use and the processing of the personal Data, as laid down in this Policy. The purpose of processing of the data is to facilitate the keyless rental of the vehicle, enabling locating the vehicle and to detect and prevent fraud (including protection of platform and users, against misbehaviour/ abuse/ fraud and other criminal activity). To withdraw your consent, you can unsubscribe from the SnappCar Keyless Program and have the Keyless technology de-installed from your vehicle. You will be able to use the SnappCar Services, however no longer the SnappCar Keyless rent-out.

### **SnappCar processes your data if you use SnappCar Keyless - This means:**

- The SnappCar Keyless technology gathers location data which is necessary to provide the SnappCar Keyless service (i.e. locating the vehicle), log information (status, car diagnostics, ignition, speed etc.), User information (contact details such as name, e-mail and phone number) as well as Vehicle information (License plate number and brand/ model);
- All data gathered through the SnappCar Keyless technology may be stored and used by SnappCar to provide the Keyless services (enable the service, locating the vehicle, for purposes to detect and prevent fraud or misuse of the services, including monitoring & analyzing to this end);
- SnappCar will handle the data and analyses with utmost care. The data will only be used for the purposes as mentioned above;
- The data can be shared with service providers (such as the Keyless Technology supplier (INVERS GmbH) and the Installation Partner (i.e. Protect Effect B.V. in NL, Sand BilCentrum ApS in Denmark and StjärnaFyrkant Sverige AB in Sweden);
- The processing by service providers is governed by so-called data processing agreement(s) in which SnappCar has ensured that the service provider shall only process the personal data on instructions of SnappCar. None of the service providers are located outside the European Economic Area (EEA);
- The data will not be shared with other third parties in such a way that it can be traced back to individual Users;
- SnappCar remains the right to share data with third parties in case of lawful obligation and/or when there are valid grounds to do so, such as a suspicion of criminal or fraudulent activities;

When you use the app (or website) via a push-enabled device, you can consent in receiving push messages; You can always withdrawal your consent to the reception of push messages. To withdraw your consent, you can deactivate these messages at any time by changing the notification settings in your account or your device settings or by uninstalling the SnappCar app from your device.

SnappCar may use other third parties to carry out (extra) checks and risk assessments, besides the ones in place and described in the SnappCar Privacy Policy, for the purpose of preventing and detecting fraud, such as a credit score or debt – assessment. When SnappCar decides to do so, we will inform Users up front how and where the assessment will take place.

Please check the [SnappCar Privacy Policy](#) for further (and more detailed) information on how we process and handle personal data.

### **Retention**

SnappCar retains your personal data (as location data, log files, events, car diagnostics) in the SnappCar Keyless Application for a period of 3 months, after which it is automatically deleted. For fraud prevention and detection purposes we may retain necessary personal data for a reasonable period of time, which may exceed the data retention period as stated above.

SnappCar may also retain personal data longer if this is required by applicable law.

### **Contact**

The party responsible for the processing of personal data within the SnappCar Group of companies (including MinBilDinBil ApS, Flexidrive Sverige AB and CarShare Germany GmbH), is SnappCar (a trade name of Carshare Ventures B.V.).

All questions regarding the processing of personal data by SnappCar can be addressed to:

- [Privacy@SnappCar.nl](mailto:Privacy@SnappCar.nl),
- and by telephone via +31 (0)30-2087011 or
- + 49 (0)30-58849323 (Users in Germany),
- + 46 (0)10-8848003 (Users in Sweden),
- + 45 (0)89-883586 (Users in Denmark).

### **Language & translation**

The English language is used for this Keyless Privacy Policy; in the event of any questions, please inform and we will provide a translation of the said provision(s) and/or further explanation, at first request.

### **Questions & complaints**

If you have any questions in connection with your personal data, you may also contact our data protection officer: Lora Mourcous, e-mail: [DPO@snappcar.nl](mailto:DPO@snappcar.nl) , Tel # : +31 (20)530.01.60.

Under the GDPR, you have a number of rights with regard to your personal data and the processing thereof – we refer to our [SnappCar Privacy Policy](#). for specifics and you may send your request(s) to SnappCar at [Privacy@snappcar.nl](mailto:Privacy@snappcar.nl).

In case you suspect a breach of data protection legislation and the matter is not solved amicably, you have the right to lodge a complaint with a supervisory authority.

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