

MYBEE PRIVACY POLICY

MyBee Latvia (hereinafter – **we** or the **Company**) values and protects the privacy and security of personal data, therefore in this Privacy Policy (hereinafter – the **Privacy Policy**), we explain how we handle the personal data of our clients and other data subjects (hereinafter – **you or the Client**) when using: (a) the MyBee Website App (hereinafter – the **Web App**); (b) MyBee vehicles – cars (hereinafter – the **Vehicles**); (c) MyBee website www.mybee.lv (hereinafter – the **Website**) and (d) entering into the Subscription Agreement with us; (e) communicate with us by phone, e-mail or social networks.

We take appropriate measures to ensure that the personal data - any information that can be used to identify an individual that is provided to us is always secure and that we process personal data in compliance with Regulation (EU) 2016/679) (hereinafter – the **GDPR**) applicable data protection laws, our internal policies, guidelines, and procedures.

In this Privacy Policy, we present the most important structured information about the protection of your personal data: i.e., what personal data we collect, how and why we use it, on what legal basis we process it, how long we store it, to whom we transfer it, as well as our duties in processing your personal data, your rights, and the methods of their implementation. **The most important information about processing your personal data is presented in the tables in Chapter 14 of this Privacy Policy.** Please take the time to review this Privacy Policy, and please do not hesitate to contact us if you have any questions.

If you use the Web App and/or the Website, we will assume that you are familiar with this Privacy Policy and the purposes, methods, and procedures for the processing of your personal data specified in it. If you do not want your personal data to be processed as described in this Privacy Policy, please do not use the Web App and/or Website, and do not provide us with your personal data in any other way.

The Privacy Policy is a constantly changing document, so we can improve, change, and update it if necessary. For this reason, please visit the Website or Web App from time to time, where you will always find the latest version of the Privacy Policy. We will also additionally inform you about the most significant changes to the Privacy Policy, and we will always publish the updated version on our Website and Web App.

The latest changes to the Privacy Policy have been made and are valid from 27 of February 2023.

1. DEFINITIONS

The following terms are defined as follows in this Privacy Policy:

We or the **Company** shall mean MyBee Latvia, a private limited liability company, established and operating under the laws of the Republic of Latvia, legal entity code: 40203431136, address of registered office: Zemitana st. 9 k-1, LV-1012, Riga, Republic of Latvia.

Services or **MyBee Services** shall mean all services that the Company offers and provides to you, including, among other things, (i) rent (use) of the Vehicle; (ii) maintenance of the Vehicle and assets therein, insurance as specified in the Subscription Agreement; (iii) other services provided on the Web App and/or the Website.

Client shall mean the natural person who concluded the Subscription Agreement with us, or if a legal person concluded the Subscription Agreement with us, then the natural person representing them, as well as the natural person to whom the person who concluded the Subscription Agreement with us has granted permission to possess and temporarily use the Vehicle.

Website shall mean the website accessible at www.mybee.lv .

Web App shall mean software functionalities, settings, features, and other services provided via the Website, which are used to perform actions in connection with rent of MyBee Vehicle and Services delivery – Vehicle reservation, Subscription Agreement conclusion, and/or other associated actions provided for therein.

Account shall mean a digital account of a natural or legal person, for personal use, created in the Web App or the Website.

Subscription Agreement shall mean the agreement on the provision of the Services concluded between the Client and the Company.

EEA means the European Economic Area, which consists of the European Union states and Liechtenstein, Iceland, and Norway.

Other terms shall have the meanings assigned to them and defined in the GDPR and/or the Services Agreement.

2. ON WHAT LEGAL GROUNDS DO WE PROCESS YOUR PERSONAL DATA?

We process your personal data specified in this Privacy Policy based on the following legal bases:

- when concluding, executing, changing, and administering the Subscription Agreement (Art. 6(1)(b) GDPR);
- fulfilling the legal obligations and requirements of legal acts applicable to us (Art. 6(1)(c) GDPR);
- implementing our and third parties legitimate interests (Art. 6(1)(f) GDPR);
- implementing your consent (Art. 6(1)(a) GDPR, Art. 9(2)(a) GDPR).

In the scope and conditions provided by the applicable legal acts, one or more of the above-mentioned legal bases may be applied to the processing of your same personal data. **The purposes and legal bases for the processing of your personal data are described in detail and presented in Chapter 14 of this Privacy Policy.**

3. FOR WHAT PURPOSES AND WHAT PERSONAL DATA DO WE COLLECT?

We collect and process only your personal data that are sufficient and necessary to achieve the purposes for which they are processed. **The purposes for processing your personal data and the list of collected personal data are described in detail and presented in Chapter 14 of this Privacy Policy.**

We may combine personal data we have received from you (when you are using the Web App, the Services, and/or the Website) with the personal data we have collected from other public or accessible sources (e.g., with data obtained using the website cookies, or with data legally obtained from third parties, etc.).

4. CAN YOU NOT PROVIDE YOUR PERSONAL DATA AND/OR NOT CONSENT TO THE PROCESSING OF YOUR PERSONAL DATA?

Your personal data is collected and processed to conclude or fulfil the Subscription Agreement with you and/or enable us to provide the Services and respond to your requests and complaints promptly and adequately. Suppose you do not provide your data, provide it with errors, or refuse to provide it further. In that case, we probably will not be able to conclude and/or execute the Subscription Agreement, provide the Services and adequately respond to your requests, complaints, and/or other requirements that require our action. Accordingly, failure to provide personal data or refusal to continue to provide certain personal data will mean that the Subscription Agreement with you will not be concluded or will be terminated.

If we process your personal data based on legitimate interest, we have weighed the opposing interests and have decided that considering the purpose for processing personal data and the measures that we have taken, our (or the relevant third party's) interest in processing your personal data is not overridden by your interests or fundamental rights and freedoms which require protection of personal data. In this case, you have the right to receive more information regarding this processing and/or the right to object to the processing of your personal data based on legitimate interest.

In cases where we process personal data based on your consent, you have the right to withdraw your consent at any time, and data processing based on your consent will be terminated.

Chapter 10 of the Privacy Policy outlines more information about your rights.

5. DO WE SHARE YOUR PERSONAL DATA WITH OTHERS?

Yes, the Company discloses all or part of your personal data to the following data recipients: various service providers, companies belonging to the same group as the Company, competent authorities, and other data controllers who have the right to information under applicable laws and/or our legitimate interests. Also, upon receipt of your consent, your personal data may be disclosed to persons and/or companies indicated by you.

The Company uses various service providers (e.g., server and cloud rental, IT service, identity verification, payment collection, audit, accounting, legal, tax consulting services, claims administration, debt collection, analytics, direct marketing, customer service, and other service providers). All service providers have concluded service and data processing contracts with us and are considered processors of your personal data, who can process your personal data only following our instructions and in strict compliance with the purposes of the processing. All data processors, like us, must ensure the security of your personal data under the applicable laws.

To ensure the smooth provision and quality of the Services, it may be necessary to transfer some of your personal data to other companies belonging to the same group as the Company. Intergroup companies, like other service providers, are considered data processors and are subject to all the terms and conditions applicable to data processors.

- If necessary and on legally justified grounds, we also provide your personal data to service providers who are separate data controllers, as well as to various institutions, organizations, and other data controllers who have the right to receive information under applicable legislation and/or our legitimate interests. For example: in the event of an incident and/or car accident, your data will be transferred to insurance companies and, if necessary, to other parties involved in the accident;
- after receiving fines for traffic violations, we have the right and, in certain cases, the obligation to disclose the data of the person who violated the traffic rules to the relevant authorities (e.g., the police), based on the Vehicle data we have;
- we have the right and, in certain cases, the obligation to transfer information about you to competent authorities (e.g., law enforcement authorities, courts, other dispute resolution authorities) for the purposes of investigating fraud, crime, crime prevention, and other investigations;
- after receiving fines for parking violations, we have the right and, in certain cases, the obligation to transfer your data to parking lot owners or designated collection companies that contact us on their behalf;
- if you do not fulfil your financial obligations according to the Subscription Agreement and do not pay the debt within the deadline specified in the notice, we have the right to transfer your personal data to debt collection companies, bailiffs, and courts in order to start debt collection processes;
- if a guarantor is used when concluding or executing the Subscription Agreement, both Subscription Agreement and debt documents can be transferred to the guarantor for direct debt collection;
- your personal data may also be transferred to other data controllers (insurance companies, vehicle maintenance service providers, or other additional service providers);
- your personal data may also be transferred to other service providers who are independent data controllers whose offers, promotions, and game campaigns you have agreed to receive;
- your personal data may also be transferred to operators of social network platforms if you perform active actions on our social media profiles (e.g., Facebook, LinkedIn).

6. DO WE TRANSMIT DATA OUTSIDE THE EEA?

Data processors and independent data controllers with whom we share your personal data are usually located in European Union member states or store data entrusted to us in European Union countries. However, we have cases where carefully selected service providers (e.g., Google, Microsoft Azure, etc.) and controllers (e.g., operators of social networking platforms LinkedIn, Facebook, etc.) process personal data outside the EEA.

In such cases, we carefully follow the practices and guidelines of supervisory authorities regarding the transfer of personal data outside the EEA and carefully assess the conditions under which the data is transferred and may continue to be processed and stored after the transfer outside the EEA. Also, to ensure an adequate level of data security and to guarantee the lawful transfer of data, where possible, we sign the standard contractual clauses approved by the European Commission for data transfers outside the EEA or ensure that this is done otherwise, in accordance with GDPR standards.

14 of the Privacy Policy outlines more information if your personal data is transmitted outside the EEA.

7. DO WE PERFORM AUTOMATED DECISION-MAKING AND/OR PROFILING?

The Company uses automated decision-making, including profiling, to fulfil the terms of the Agreement (e.g. allocation of benefits, etc.) and to provide customized direct marketing services (e.g. sending newsletters only to interested clients). Accordingly, the Company may collect, analyse and process personal data by applying special algorithms and prediction models about your choices, behaviour, criteria for using the Services, amounts spent, and similar characteristics. All these performed actions do not have any legal or similarly significant effect on you.

8. HOW LONG DO WE STORE YOUR PERSONAL DATA?

We process and store your personal data for no longer than the purpose(s) of processing required or when required by law. Detailed information about the possible purposes of processing your personal data and the retention periods of personal data processed for these purposes is specified in Chapter 14 of this Privacy Policy.

At the end of the set term for processing and storing your data, we delete your personal data or reliably and irreversibly anonymise them as soon as possible, within a reasonable period necessary to perform such an action.

Your personal data may be stored longer than specified in this Privacy Policy only when:

- your data is necessary for proper administration of debt or damage (e.g., you failed to fulfil your financial and/or property obligations or caused damage to the Company or other persons) for the investigation of a dispute, complaint, to ensure our or third parties' legal interests;
- it is necessary for the Company to be able to defend itself against existing or threatened demands, claims, or lawsuits to exercise its rights;
- there are reasonable suspicions of violations or illegal acts, for which there is or may be an investigation;
- the data is necessary to ensure the security, integrity, and resilience of information systems (e.g., after noticing suspicious actions in the Account, Mobile App, Website, etc.);
- there are other grounds provided for in legal acts.

9. HOW DO WE ENSURE THE SECURITY OF YOUR PERSONAL DATA?

We process your personal data responsibly and securely, following our internal data processing rules and appropriate technical and organizational measures to protect personal data against unauthorized data processing, accidental loss, destruction, damage, alteration, disclosure, or any other illegal processing action. Accordingly, we follow the following essential data processing principles:

- we collect personal data only for defined and legal purposes;
- we process personal data honestly and only for the primary purpose;
- we store personal data for no longer than the established purposes or legal acts require;
- we entrust the processing of personal data only to employees who have been granted such right and official access;
- we process personal data only by applying appropriate technical and organisational measures;
- we disclose personal data to third parties only if there is a legal basis;
- if applicable, we inform the State Data Protection Inspectorate about recorded or suspected violations of personal data security;
- we periodically conduct data protection training for our employees;
- we perform periodic internal and/or external IT security audits;
- we change, adapt, and constantly improve various processes to ensure the safest possible personal data collection, reception, transmission, use, etc. processing steps.

We emphasize that we regularly monitor our systems for possible violations or attacks. Still, it is impossible to ensure complete security of information transmitted over the Internet or to prevent breaches, especially those that may occur due to your carelessness or disclosure of data to others. Taking this into account, we note that you also bear the personal risk of submitting personal data using the Internet connection through the Web App and the Website. You also maintain the entire risk related to the voluntary disclosure of your Account data to others and/or the careless use of your personal data you receive directly from us.

10. WHAT RIGHTS DO YOU HAVE?

If we process your personal data for the purposes set out in this Privacy Policy or if you have reason to believe that we are processing your personal data, then you, as a data subject, have the following rights under the GDPR:

- **The right to know** – to know (be informed) about the processing of your personal data;
- **The right to access** – to receive confirmation as to whether your personal data is being processed, and if so, to request access to your personal data and receive a copy of it;
- **The right to correct** – to request that inaccurate or incomplete personal data be corrected;
- **The right to object** – in certain cases, to object to the processing of your personal data;
- **The right to withdraw your consent** – when we process personal data with your consent;
- **The right to limit** – to request that redundant or illegally processed personal data be restricted;
- **The right to delete data/be forgotten** – to request the deletion of illegally processed personal data or those personal data that are no longer necessary to achieve the purposes for which they were collected or otherwise processed;
- **The right to transfer** – to receive your personal data in a systematized computer-readable format and transfer that data to another data controller;
- **The right to complain** – file a complaint with the State Data Protection Inspectorate, but we recommend contacting us first, and we will try to solve all your requests together with you.

10.1. Right to know:

In this Privacy Policy, we try to provide you with relevant information about processing your personal data as simply and in detail as possible. The most important information for you can be found in Chapter 14 of the Privacy Policy, which details the purposes of processing personal data, categories of data, legal grounds for processing, and storage terms.

10.2. The right to access the processed data:

In order to exercise this right, contact us via e-mail dpo@modusmobility.group and we will send you a letter with information (or will explain in person) how you can obtain a copy of your personal data.

10.3. The right to correct personal data:

If the personal data you provided has changed (surname, e-mail address, telephone, driver's license, etc.), or you believe that the information we process about you is inaccurate, you have the right to demand to change, clarify, or correct information.

You can make some changes to your personal data yourself in your Account via the Web App (e.g., upload a new driver's license, change your address, etc.). In other cases, you must contact us via contacts stated in Chapter 13 of the Privacy Policy.

10.4. The right to object personal data processing:

Suppose you have reason to believe that our data processing violates your fundamental rights and freedoms and / or is being processed against GDPR or other legal requirements. In that case, you can exercise your right as a data subject and limit the data processed.

However, we must point out that this may lead to us being unable to guarantee you all the Services, which may lead to the suspension or termination of the Subscription Agreement.

To exercise this right, you must contact us via contacts stated in Chapter 13 of the Privacy Policy.

10.5. The right to withdraw your consent:

In cases where we process personal data based on your consent, you have the right to withdraw your consent at any time, and data processing based on your consent will be terminated. For example, you can withdraw your consent to receive marketing offers and various information at any time through any channels we provide (e.g., newsletters, SMS messages, in Web App notifications, etc.). Revoking these consents will

not prevent you from continuing to use our Services, but it will mean that we will not be able to provide you with valuable offers about our Services. We also note that the withdrawal of consent does not affect the lawfulness of data processing until the withdrawal of consent.

To exercise this right, you can conveniently do so in the following ways:

- you can unsubscribe from the newsletter at any time by clicking the e-mail the "Unsubscribe from newsletters" link in the letter;
- you can easily manage and change newsletters and active notifications in the Web App (push notifications), in your Account settings (by clicking on "My Profile" and then by clicking on "Subscription to offers");
- by changing the operating system settings of your device (in case of Cookies);
- by contacting via the contacts specified in Chapter 13 of the Privacy Policy.

10.6. The right to restrict data processing:

You have the right to restrict our ability to process your personal data. After you limit the processing of your personal data, we will no longer carry out any active actions with your personal data other than personal data storage. However, the restriction of personal data may mean that during the restriction period, we may not be able to provide you with the Services, which may result in the suspension or termination of the Subscription Agreement.

You can limit the processing of personal data in at least one of the following circumstances:

- your personal data is inaccurate (personal data processing actions, in this case, will be limited until the accuracy of the personal data is checked);
- your personal data is processed illegally, but you do not agree to have your data deleted;
- the Company no longer needs your personal data for the specified purposes, but you need them to assert, fulfil or defend legal claims;
- your personal data is processed based on legitimate interest, and you object to such processing of personal data. In this case, data processing will be limited until it is checked whether the reasons for which we process your personal data are superior to you.

To exercise this right, you must contact us via contacts stated in Chapter 13 of the Privacy Policy.

10.7. Right to delete data (right to be forgotten):

You have the right to request that we no longer process your personal data and delete it in the event of at least one of the following circumstances:

- personal data are no longer necessary to achieve the purposes for which they were collected or otherwise processed;
- you revoke the consent on which the data processing was based, and there is no other legal basis for processing the data;
- your personal data is processed illegally;
- you have submitted an objection to the processing of personal data on the basis of our legitimate interest, and it is proven that your interests are superior in a particular case.

We will consider your request to delete your personal data (e.g., request to delete your Account) as a request also to terminate the Subscription Agreement, which will be terminated in accordance with the procedure provided in the Subscription Agreement terms. A request to delete only certain of your personal data may also result in the suspension or termination of the Subscription Agreement or the fact that we will not be able to provide you with all Services.

If you express a wish to delete all or part of your data, we will no longer actively process your data, which will no longer be necessary for the purposes for which they were collected or otherwise processed, but personal data will be stored according to the established terms, for the following reasons:

- for accounting and tax requirements, personal data will continue to be processed following Article 6(1)(c) GDPR – processing the data is necessary to fulfil the legal obligation applicable to the Company;
- GPS (location) data will continue to be processed following Article 6(1)(f) GDPR – processing of data is necessary for the legitimate interests of the Company or a third party;
- to process customer complaints and other appeals, personal data will be processed following Article 6(1)(b) GDPR – processing of data is necessary to fulfil the agreement to which the data subject is a party;

- Ensure the implementation of blacklisting to forbid the use of Services in the future following Article 6(1)(f) GDPR – processing of data is necessary for the legitimate interests of the Company or a third party;
- in the event of disputes, claims, or debt administration, the personal data will continue to be processed to secure our other legal requirements and protect rights following Article 6(1)(f) GDPR – processing of data is necessary for the legitimate interests of the Company or a third party.

To exercise this right, you must contact us via contacts stated in Chapter 13 of the Privacy Policy.

10.8. Right to data portability:

When data processing is based on your consent or an agreement and is carried out by automated means, you have the right to receive the data you have provided and or created to us in a structured, commonly used and computer-readable format. Also, if it is technically possible at your request, your data may be forwarded directly to another data controller specified by you.

10.9. Right to file a complaint:

If you believe that we process your data in violation of personal data protection legislation requirements, please get in touch with us directly first. We believe that with good faith and effort, we will be able to dispel all your doubts, answer your questions, satisfy your requests, and correct any mistakes we have made.

If you are not satisfied with our proposed method of solving the problem or, in your opinion, we will not take the necessary actions according to your request. You will have the right to file a complaint with the State Data Protection Inspectorate ((Elijas iela 17, Rīga, LV-1050, e-mail pasts@dvi.gov.lv, tel. +371 67223131).

11. HOW CAN YOU EXERCISE YOUR RIGHTS?

You can make requests to exercise your rights in the following ways:

- You can exercise your rights by **contacting us via e-mail dpo@modusmobility.group** and submitting a free-form request. Your request will be accepted and processed only if e-mail from which you contact us matches the e-mail that is linked with your Account. In response to your request, we may send a control message to the last contact in the Account (via SMS and e-mail), asking for an active authorization step and/or requesting additional documents or data.
- By phone: 37128233888 (please note that we cannot exercise all of your rights by phone). When you contact us by phone, we firstly verify your identity by asking you to provide your Account information or other information that only you should know. As part of this verification, we may send a verification message (by SMS or e-mail) to the last contact on your Account, asking you to take active action. If the verification procedure fails, we will have to declare that you are not a data subject and will have to reject your request;
- You can also exercise your rights by **coming to our customer service department** and filling out the application form, in which case we will ask you to show your identity document (we will not keep a copy of the document);

If we have doubts about your identity before taking active steps, we can ask you to provide us with additional documents and evidence, submit a request only in writing and/or sign with a qualified electronic signature, or come to our customer service department. For example, in cases where you do not have an Account, you cannot verify your identity by phone and/or you no longer have the e-mail address provided in the Account phone number.

12. HOW DO WE PROCESS YOUR REQUESTS TO EXERCISE YOUR RIGHTS?

To protect our clients' data from unauthorized disclosure, we will need to verify your identity upon receipt of your request to exercise your right(s). To confirm a person's identity, we primarily use the methods specified in Chapter 11 of the Privacy Policy. After receiving your request to exercise your right(s) and when the identity mentioned above verification procedure was successful, we undertake to provide you with information about the actions we took/or did not take in response to your request as soon as possible, but in any case, no later than within 1 (one) month from the date of receipt of your request.

Remember that your rights are not absolute, and we have the right to refuse to fulfil your request with a reasoned written answer under the conditions and grounds provided by legal acts. Considering the complexity and number of requests, we have the right to extend the period of 1 (one) month by another 2 (two) months, informing you about this before the end of the first month and indicating the reasons for such an extension. If your request is submitted electronically, we will also provide you with an answer electronically, unless this is impossible (e.g., due to a substantial amount of information) or when you request to answer in another way. We will provide the information to you free of charge, but if the requests are manifestly unreasonable or disproportionate, in particular, due to its repetitive content, we may charge a reasonable fee to cover administrative costs or refuse to act on your request.

13. HOW CAN YOU CONTACT US?

The data controller that processes your personal data specified in this Privacy Policy is Mybee Latvia (a private limited liability company, established and operating under the laws of the Republic of Latvia, legal entity code: 40203431136, address of registered office: Zemitana st. 9 k-1, LV-1012, Riga, Republic of Latvia).

In compliance with GDPR requirements, we have appointed a data protection officer whom you can contact regarding all issues of this Privacy Policy and all other data processing issues and data subject rights. Data protection officer contacts - e-mail: dpo@modusmobility.group .

You can also contact us by phone by calling the general Customer Service number – [+37128233888](tel:+37128233888).

In addition, you can also find a lot of relevant information in the Frequently Asked Questions (FAQ) section of our Website.

14. DETAILED INFORMATION ABOUT THE PROCESSING OF YOUR PERSONAL DATA

The following tables are divided into convenient separate categories according to the purposes of the processing and describe in detail the data processing processes, provide detailed information about how we collect, why we collect, for what purposes we use, and how long we store your personal data.

14.1. CREATING AN ACCOUNT IN THE WEB APP

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| When are your personal data processed? | <p>If you wish to start using our Services, you must register and create a personal Account in the Web App, as the Subscription Agreements are concluded with and the Services are provided only through the Web App and only to Clients with Accounts.</p> <p>To ensure the proper provision of the Services and the operation of the Account, we must collect and process your personal data determined by us (a necessary standard) to recognize you as a Client and to be able to provide services remotely via computer / smartphone devices.</p> <p>After completing the Account creation process, you can immediately see the functionality of the Web App, all the Vehicles, and their subscription terms.</p> |
| Data categories | <p>Name, surname, mobile phone number, email address, password, residential address.</p> <p>Account data (email and phone number) confirmation records, Account creation date, Terms of Use and Privacy Policy acceptance records, direct marketing consent records, IP address, and other technical records.</p> |
| Legal grounds for data processing | <p>GDPR Article 6(1)(b) – Execution of a contract:</p> <ul style="list-style-type: none"> • Conclusion of a Subscription Agreement. |

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| Duration of data processing | If Client hasn't confirmed email and/or phone number attempted registrations are automatically deleted after 1 month from the attempt date. |
| | If the Account was terminated/deleted without entering Subscription Services – during the effective term of the Account and for a maximum period of 3 months after its expiry . |
| | In all other cases, during the effective term of the Web App Account and for a maximum period of 5 years after its expiry . |
| | Chapter 8 of the Privacy Policy lists the cases and conditions when your Personal data may be stored or otherwise processed for longer. |

14.2. USE OF THE MYBEE WEB APP

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| When are your personal data processed? | <p>When you use the Web App, we register information about your actions in the Web App and your Account and process your various personal data. We do so to ensure the fulfilment of the Subscription Agreement and the smooth operation, integrity, and security of the Web App and our information systems.</p> <p>Also, data is collected and processed to identify a possible threat or abuse of the Services, fraud, or other illegal activity, to protect the Web App, information systems, and data from unauthorized changes, cyber-attacks, unauthorized access, and other related risks.</p> |
| Data categories | <p>Personal data about connecting to the Web App, data about the device's operating system, Account usage history, settings, parameters, and changes, various usage and technical records;</p> <p>Direct marketing consents and/or withdrawals, Web App reading records of important messages;</p> <p>Account information, records of acceptance of new terms of use, and/or confirmation of familiarization with the Privacy Policy;</p> |
| Legal basis for data processing | <p>GDPR Article 6(1)(b) – Execution of a contract:</p> <ul style="list-style-type: none"> • Execution and administration of the Web App Account and Services via Web App. |
| Data retention period | <p>Various system and technical records – 3 months from the date of their creation.</p> <p>If the Account was terminated/deleted without using any Subscription Services – during the effective term of the Account and for a maximum period of 3 months after its expiry.</p> <p>After you have used the Services – during the entire Subscription Agreement validity and for 5 years after it ends.</p> |

14.3. CONFIRMATION OF PERSONAL IDENTITY AND SUBMISSION OF DOCUMENTS

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| When are your personal data processed? | <p>If you intend to sign a Subscription Agreement and rent a Vehicle, we must confirm your identity and whether you have the right to drive a Vehicle, as well as collect supporting evidence. Without this confirmation step, we cannot provide you with our Subscription Services.</p> <p>In cases where you are from a third country (i.e., not a citizen of the EEA), the driver's license you submitted does not have a personal identification number, or the driver's license or photo provided is inconclusive, before allowing you to use the Services, we will contact you via video call, during which we will ask you to</p> |
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| | <p>show an additional identification document and/or request to send us an additional copy of your identification document.</p> <p>If you do not agree or cannot submit your face photo (selfie) and / or driver's license data through the Web App for identity and driving license verification, you can contact us, and depending on the circumstances, we may be able to offer you an acceptable alternative method of data submission.</p> |
| Data categories | <p>Face image (selfie), face image with driver's license in hand (selfie), photo of the first side of the driver's license;</p> <p>Name, surname, personal identification number or another identification number, date of birth, driver's license number, expiration date, photo of the Customer's face from the driver's license, state, and authority that issued the driver's license;</p> <p>Data for verifying the authenticity and validity of the driver's license, data for checking the correspondence between the face image and the photo on the driver's license, the date of uploading the driver's license to the Account, video call</p> |
| Additional categories of data, if it is necessary to check your identity and/or the accuracy and completeness of the data provided by the video call or by collecting additional document | <p>Date and time when the video call took place;</p> <p>Personal code or another identification number (collected during the conversation and recorded in your Account).</p> <p>In some cases a copy of passport or ID document;</p> <p>Comment with the reason why did you not pass the identity verification or document verification process during the video call.</p> |
| Legal basis for data processing | <p>GDPR Article 6(1)(b) – Execution of a contract:</p> <ul style="list-style-type: none"> • Execution and administration of the Subscription Agreement; • Ensuring that the identity of the Clients is appropriately verified and the use of the identity of other persons is prevented. <p>GDPR Article 6(1)(c) – legal obligation applicable to the Company:</p> <ul style="list-style-type: none"> • Ensuring that only persons with the right to drive can use the Company's Services. <p>GDPR Article 9(2)(a) – Consent:</p> <ul style="list-style-type: none"> • Processing the face image (selfies). |
| Data retention period | <p>If the Account was terminated/deleted without using any Subscription Services – during the effective term of the Account and for a maximum period of 3 months after its expiry.</p> <p>After you have used the Services – during the entire Subscription Agreement validity and for 5 years after it ends.</p> <p>The video call is not recorded and stored.</p> <p>Chapter 8 of the Privacy Policy lists the cases and conditions when your Personal data may be stored or otherwise processed for longer.</p> |

14.4. CONCLUDING AN AGREEMENT WITH PRIVATE NATURAL PERSON CLIENTS

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| When are your personal data processed? | <p>To use the Services, it is not enough to create an Account in the Web App – you also have to conclude the Subscription Agreement with us.</p> <p>The Subscription Agreement with natural person Clients is concluded and signed only electronically via the Web App after choosing a Vehicle</p> |
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| | model and specific rental conditions, also by performing all verification and confirmation steps requested in the Web App. |
| Data categories | <p>To conclude the Subscription Agreement, we will process the following Personal data: all Personal data stated in Tables 14.1. - 14.3.</p> <p>Also, all information provided in the Subscription Agreement (e.g., payment method, pre-payment amount, monthly payments, duration of the Services etc.).</p> <p>Payment information such as payment card four last numbers, and deposit payment.</p> <p>Additionally, technical data, such as Web App Account creation date, acceptance with the Subscription Agreement and Privacy Policy last versions of terms, log details, additional consents, and IP address etc.</p> |
| Legal grounds for data processing | <p>GDPR Article 6(1)(b) – Execution of a contract:</p> <ul style="list-style-type: none"> • Execution and administration of the Subscription Agreement and Services. |
| Duration of data processing | <p>During the effective term of the Subscription Agreement and for a maximum period of 10 years after its expiry.</p> <p>Chapter 8 of the Privacy Policy lists cases and conditions when your Personal data can also be stored or otherwise processed for longer.</p> |

14.5. USE OF THE MYBEE SERVICES

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| When are your personal data processed? | <p>When you use the Services, i.e., Vehicle subscription, we collect various information about the use of the Services and your actions to ensure fulfilment of the terms of the Subscription Agreement and the smooth provision, integrity, and security of the Service.</p> <p>Also, all data generated and collected during the Services, including Personal data about your use of our Services, help us to carry out the traceability and accuracy of the Services provided and is also used to protect our interests if there are noticeable illegal actions that are considered as part of the Subscription Agreement violation.</p> <p>Every Vehicle has electronic GPS monitoring system installed to register and transmit to us the Vehicle's location, the distance travelled by the Vehicle, speed, and other data related to the Vehicle usage. Mobility data is essential to us because, with its help, we determine Vehicle location, and have accurate travel traceability to ensure our own and/or third parties' legitimate interests (especially relevant in the case of leaving country, theft, damage, and in traffic rules violations or criminal activity traceability cases).</p> <p>Suppose you connect your device to the Vehicle's devices (e.g., navigation, multimedia systems) while using the Vehicle. In that case, your device's data, such as your given name, device-stored contacts, and Bluetooth ID, will be stored in the Vehicle unless you remove them following the Vehicle manufacturer's instructions.</p> |
| Data categories | <p>Vehicle first pick up date and time, Vehicle use date and time, Vehicle locking/unlocking time (if it is done via Web App), Service start and Service end date and time.</p> <p>Vehicle GPS data associated with a specific Client, detailed GPS coordinates, date and time of use of the Vehicle, route, speed, travel distance, duration, Vehicle picked up and left places.</p> |

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| | <p>The Service’s price, the payment amount for the Services, the fact of issuing the invoice, the fact and amount of the debt, and the maximum amount owed by the Client for the Services provided. Data of the completed payment transactions (date, amount, last four digits of the payment card, etc.), the amount of the replacement car credit and its usage history;</p> <p>Discounts, coupons and/or codes, participation in programs, their validity, and use.</p> |
| Legal basis for data processing | <p>GDPR Article 6(1)(b) – Execution of a contract:</p> <ul style="list-style-type: none"> • Execution and administration of the Subscription Agreement; • Identify violations of the Subscription Agreement. <p>GDPR Article 6(1)(c) – Legal obligation applicable to the Company:</p> <ul style="list-style-type: none"> • Obligation to report your Personal data in case of an administrative and/or criminal offense. <p>GDPR Article 6(1)(f) – Legitimate interest of the Company and third parties:</p> <ul style="list-style-type: none"> • To ensure the protection of Vehicles and other assets of the Company, as well as safety of third parties and their assets; |
| Data retention period | <p>GPS data - 12 months from the date of its creation.</p> <p>After you have used the Services – during the entire Subscription Agreement validity and for 5 years after it ends.</p> <p>Chapter 8 of the Privacy Policy lists the cases and conditions when your Personal data may be stored or otherwise processed for longer.</p> |

14.6. ACCOUNT BLOCKING AND/OR TERMINATION OF SUBSCRIPTION AGREEMENT

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| When are your personal data processed? | <p>The Services provided by us are subject to the established Terms of Use and the Motor vehicle subscription agreement, which you agreed to before starting to use the Web App and concluding a Subscription Agreement with us.</p> <p>Therefore, we have the right to collect information related to the use of the Services, to respond to received information related to violations of the Terms of Web service and Subscription Agreement, and to take active actions when gross violations of our rules are detected.</p> <p>Accordingly, when we detect violations of the Subscription Agreement or Terms of Use, we may block or suspend the use of the Account, according to the terms set by us. However, in cases where the violations are extremely serious (e.g., drunk driving, causing a major accident, and other violations indicated in the Subscription Agreement), then we have the right to terminate the Subscription Agreement with you and, in addition, add you to the list of blocked persons, so that you cannot use the Services and conclude a Subscription Agreement with us in the future.</p> |
| Data categories | <p>All data about the Client, available from the Account and the use of the Services as stated in all tables above;</p> <p>Reason for blocking or termination of the Subscription Agreement, basis, comment of the employee who performed the blocking or termination of the Subscription Agreement, duration of the blocking;</p> <p>Blocking list (Client name, date of birth, blocking date, and blocking term).</p> |

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| Legal basis for data processing | <p>GDPR Article 6(1)(b) – Execution of a contract:</p> <ul style="list-style-type: none"> • Execution of the Subscription Agreement; • Monitoring how the Client uses the Services and fulfils/does not fulfil the terms of the Subscription Agreement. <p>GDPR Article 6(1)(f) – Legitimate interest of the Company and third parties:</p> <ul style="list-style-type: none"> • Prohibit blocked Clients and/or those with whom the Subscription Agreement was terminated from creating a new Account or concluding a new Subscription Agreement; |
| Data retention period | <p>After you have used the Services – during the entire Subscription Agreement validity and for 5 years after it ends.</p> <p>In case of serious violations, Clients (minimum data) are stored in the blocking list for 10 years after the Subscription Agreement's termination date.</p> |

14.7. ADMINISTRATION OF INQUIRIES, REQUESTS, COMPLAINTS, AND OTHER COMMUNICATIONS WITH YOU

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| When are your personal data processed? | If you contact us by phone and/or in writing (e-mail, via Web App, social networks, or otherwise), we will save the fact of your application and the information provided, including Personal data, so that we can properly examine your application and answer your question, request or complaint. |
| Data categories | <p>When contacted by phone: first name, last name, mobile phone number, Ae-mail, residential address, travel details, Vehicle details, and other information required to complete the Client verification. Also, all information that is become known during the call.</p> <p>Date and time of the call, call duration and call record.</p> <p>By contacting e-mail by mail / or through the Web App: name, surname, mobile phone number, e-mail address, residential address. Travel data and other information required to complete the Client verification. Additional information related to the written request and correspondence history. In providing client service, additional and sensitive information may be used or disclosed to us: driver's license information, information about the incident, traffic incident, information about the passengers, detailed description of the specific accident and/or problem, detailed circumstances of the complaint or other request, complaint and/or documents proving the accident.</p> |
| Additional categories of data if we need to contact you for important reasons | <p>Your name, surname, mobile phone number, e-mail address, GPS data, other data from the Account or use of Services, the reason for contact need;</p> <p>Date and time of the call, call duration, and call recording. The electronic message/SMS message sent to you, the fact and date of delivery of the message, the fact, and date of opening (reading) of the message, and the fact and date of opening the link provided in the content of the message.</p> |
| Legal basis for data processing | <p>GDPR Article 6(1)(b) – Execution of a contract:</p> <ul style="list-style-type: none"> • Subscription Agreement administration. <p>GDPR Article 6(1)(a) – Consent:</p> <ul style="list-style-type: none"> • to answer, consult, provide, and administer the Services when any person initiates the first conversation. |
| Data retention period | Complaints, claims, and written requests related to the execution of the Subscription Agreement, Services and/or which may be related to disputes - |

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| | during the entire validity of the Subscription Agreement and for 5 years after it ends. |
| | Call recordings are stored for 6 months from the moment of creation . |
| | Chapter 8 of the Privacy Policy lists the cases and conditions when your Personal data may be stored or otherwise processed for longer. |

14.8. ADMINISTRATION OF FINES FOR TRAFFIC RULES AND PARKING VIOLATIONS

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| When are your personal data processed? | Taking into account the terms of the Subscription Agreement, the applicable legislation, and our rights and legitimate interests, we have the right and, in certain cases, the obligation to disclose information about you and your traffic violations (e.g., speeding, driving intoxicated) to the competent authorities (e.g., the police). Also, disclose your data to municipalities and parking lot owners so that fines received are rewritten in your name. We act in this way following the requirements of the law, protecting our interests, so that you, as a possible violator of the relevant activity, can defend your rights and dispute the validity of the fine if you believe that the violation was recorded incorrectly. |
| Data categories | All data about the Client, available from the Account and the use of the Services; The fact of a parking violation, written documents about inquiries and requests for information, data disclosed by the Client and the date of disclosure; The fact of violation of traffic rules, written documents about inquiries and requests for information, data disclosed by the Client, date of disclosure. |
| Legal basis for data processing | <p>GDPR Article 6(1)(c) – The legal obligation applicable to the Company:</p> <ul style="list-style-type: none"> The obligation to report your data in case of an administrative and/or criminal offense. <p>GDPR Article 6(1)(f) – Legal interests of the Company and third parties:</p> <ul style="list-style-type: none"> We have the right to transfer information about violations of parking rules and road traffic rules to the competent authorities so that the received fine for the violation is forwarded to the customer who committed the violation. |
| Data retention period | <p>After you have used the Services - during the entire Subscription Agreement validity and for 5 years after it ends.</p> <p>Chapter 8 of the Privacy Policy lists the cases and conditions when your personal data may be stored or otherwise processed for longer.</p> |

14.9. ADMINISTRATION OF DEBT AND DAMAGES AND SECURITY OF LEGAL CLAIMS AND INTERESTS

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| When are your personal data processed? | To the extent permitted by applicable legislation, we have the right to administer, manage, collect, and/or submit for collection your debts for unpaid Services and financial damage caused to us and/or our property. We also process your personal data to implement our legal requirements and the defence of legitimate interests (including fraud prevention), protect the property and interests of ourselves, our clients, and others, gather evidence of violations and prevent violations of our interests, our clients and others, misuse of the Web App, Website, Vehicles, our Services. |
| Data categories | All data about the Client, available from the Account and the use of the Services; |

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| | <p>Information about debt(s), amount of debt, reminders, and calls to pay by e-mail, mail, repayment history, payment plan, and date of debt closing/discharge;</p> <p>If the service of a debt collection company is used: Client's name, surname, personal identification number or other personal code, residential address, e-mail address, telephone number, date of transfer of the debt to the collection company, debt, active actions of the debt collection company, repayment history and debt closing/ write-off date.</p> <p>The facts of the damage related to the Company/Vehicle/third parties, driver's license data, and all evidence and documents related to the damage.</p> <p>Insurance cases and other related information;</p> <p>Information about other persons in the Vehicle and/or who drove it.</p> <p>Information about the amount of damage, the fact of payment, payment plans, the debt incurred, etc.</p> |
| Legal basis for data processing | <p>GDPR Article 6(1)(f) - Legal interests of the Company and third parties:</p> <ul style="list-style-type: none"> • To ensure the collection of fees for services provided; • Debt administration, damage management; • To administer, manage and recover damages caused to the Company's property or a related third party; |
| Data retention period | <p>After you have used the Services – during the entire Subscription Agreement validity and for 5 years after it ends or 5 years after specific claim execution end date.</p> <p>Chapter 8 of the Privacy Policy lists the cases and conditions when your Personal data may be stored or otherwise processed for longer.</p> |

14.10. EXECUTION OF TAX, ACCOUNTING, AND OTHER OBLIGATIONS PROVIDED BY LAW

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| When are your personal data processed? | To ensure the proper implementation of tax, accounting, and other legal obligations (i.e., correct writing and declaration of accounting documents to state institutions, implementation of money laundering prevention requirements, etc.), we create various accounting documents with your personal data and administer them. |
| Data categories | Name, surname, residential address, personal identification number, VAT payer code (when the person is registered as a VAT payer); data about the Services (description of the Services; price/amount paid), issued accounting documents and their requisites, and other accounting and tax data that the Company must collect, process and store following laws and other legal acts. |
| Legal basis for data processing | <p>Article 6(1)(c) GDPR – Legal obligations and requirements of legal acts based on The Law on Accounting Section 28(5):</p> <ul style="list-style-type: none"> • Accounting, taxes, and other public obligations; • Money laundering prevention (as applicable); • Protection of consumer rights. |
| Data retention period | <p>In most cases, the storage and deletion period is calculated from the date of creation of the accounting document - 5 years after the creation of the document (e.g., VAT invoice).</p> <p>After you have used the Services – during the entire Subscription Agreement validity and for 5 years after it ends.</p> |

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| | Chapter 8 of the Privacy Policy lists the cases and conditions when your Personal data may be stored or otherwise processed for longer. |
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14.11. DIRECT MARKETING

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| When are your personal data processed? | We process your personal data to be able to provide general and/or personal offers (including offers from our partners) and other information about the Services we provide that may be relevant to you. We can send you notifications, offers, and information in several ways: by e-mail, SMS, or Web app notifications (inactive and/or active). You can easily object to the sending of messages with offers and information during the creation of an Account in the settings of the Web App, or you can easily opt out of them at any time later in the settings of the Web App (in the section Subscription to offers) or by clicking on the opt-out link in the newsletters sent. |
| Data categories | Name, surname, e-mail address, telephone number, client identifier (internal client number), country, city, age. Information and history of direct marketing consents/withdrawals. |
| Legal basis for data processing | <p>GDPR Article 6(1)(a) – Consent:</p> <ul style="list-style-type: none"> • Receive offers and information from us and our partners via SMS or e-mail. • Send you active messages in the Web App. <p>GDPR Article 6(1)(f) - Legitimate interest of the Company and third parties, based on Article 9(2) of the Law on Information Society Services:</p> <ul style="list-style-type: none"> • To send you general and personalized offers and information by e-mail. |
| Data retention period | <p>Personal data is processed as long as consent is valid, i.e., until consent is withdrawn.</p> <p>If the Account was terminated/deleted without using any Services – during the effective term of the Account and for a maximum period of 3 months after its expiry.</p> |

14.12. OPTIMIZATION OF MARKETING INSTRUMENTS

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| When are your personal data processed? | <p>We use automated data analysis and decision-making, including profiling, to provide you with personalized content and recommendations, marketing offers tailored specifically to you and/or to provide you with our other possible benefits, and to enable us to expand the range of Services offered and improve the Services we provide. We use automatic means to group and analyse your data processed for the respective purpose and make insights and predictions about what content and/or messages may be relevant to you. To get to know our Clients, their needs, and interests even better, we may also categorize Clients based on various characteristics (such as age, location, browsing and/or Service usage habits, etc.).</p> <p>The described actions do not have any legal or similarly significant effect on you, but they will allow us to understand your needs and interests better, to create and offer you more diverse Services that better meet your needs, to install the updates of the Web App you are waiting for, to provide a better-quality experience using our Services, etc.</p> |
| Data categories | Technical information related to the device used, such as browser type, device type, and model, processor, system language, memory, OS version, IP address, |

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| | <p>User agent, IDFA (identifier for advertisers), Android ID " devices); Google Advertiser ID, and other similar unique identifiers.</p> <p>Engagement information, i.e., information related to ad campaigns and final customer actions, such as clicks on ads, impressions of ads viewed, audiences or segments assigned to an ad campaign, type of ads, and web page or application where such ads were displayed, web pages, visited by the end user, URLs from the referring website, app downloads and installs, and other interactions, events, and customer actions within the app (such as car selected, trips booked, clicks, engagement time, etc.).</p> <p>Another history of your browsing in the Web App and/or Website.</p> |
| Legal basis for data processing | <p>GDPR Article 6(1)(f) - Legitimate interest of the Company and third parties:</p> <ul style="list-style-type: none"> • To implement automated devices to optimize marketing processes; • To categorise and divide clients into groups, test the marketing tools used, and organize the automated use of marketing tools for the most effective customer engagement. |
| Data retention period | <p>If the Account was terminated/deleted without using any MyBee Services – during the effective term of the Account and for a maximum period of 3 months after its expiry.</p> <p>After you have used the Services – during the entire Subscription Agreement validity and for 5 years after it ends.</p> <p>Data that is anonymized and cannot be linked to any specific Client and/or only statistical data is stored indefinitely for as long as it is needed to achieve the respective intended purpose.</p> |

14.13. ADMINISTRATION OF SOCIAL NETWORKS

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| When are your personal data processed? | <p>We administer our profiles and accounts on various social networks, such as: Instagram, Facebook, LinkedIn.</p> <p>If you are interested in our Services and follow our profiles on social networks, participate in our published games, promotions, you share your photo with us or tag us in your photo or post etc., we collect and use your data, which we receive directly from you when you perform active actions on our profile. It should be noted that our accounts are integrated into social network platforms (e.g., Facebook, Instagram, LinkedIn, etc.), so all social platform providers have all the opportunities to collect your other personal data.</p> <p>You can find detailed information about the data processing carried out by each social network platform and the purposes and scope of data use in the privacy policy of the respective social network. If you want to exercise your rights related to the data processed in social networks, it would be more efficient for you to contact the manager of the relevant social network directly.</p> |
| Data categories | <p>Name, surname, gender, country, photo, information about communication in the account ("like", "follow", "comment", "share", etc.), messages sent, information about messages (time of receiving the message, content of the message, messages attachments, correspondence history, etc.), comments, reactions to published posts, shares, information about participation in events and/or games organized by us. A photo sent/tagged to us and its public sharing.</p> |

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| Legal basis for data processing | <p>GDPR Article 6(1)(a) – Consent:</p> <ul style="list-style-type: none"> To process your data when you voluntarily perform active actions on our social network accounts. |
| Data retention period | <p>The provider of the respective social network determines the data retention periods. We recommend checking the privacy policy of the respective social network.</p> <p>Accordingly, we review the posts on our social networks that are no longer relevant and, if necessary, delete them.</p> |

14.14. ADMINISTRATION OF BUSINESS CUSTOMER ACCOUNTS

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| When are your personal data processed? | <p>If the Subscription Agreement is concluded by a business client (company, institution, organization) (hereinafter referred to as the Business Client), we accordingly process the personal data of the employees and representatives of such business client, which are specified in this Privacy Policy (for all the purposes listed in the tables above).</p> <p>Employees and representatives of business customers have all data subject rights outlined in Chapter 10 of this Privacy Policy.</p> <p>The Business Client must inform its employees or representatives about processing their personal data, as specified in the contract between the Business Client and the Company.</p> <p>If Business Clients act as data controllers of their employees, or representatives (i.e., when information is available to them through the Web App and they use it for their own purposes), we are not responsible for this, and the provisions of this Privacy Policy do not apply to such processing operations.</p> |
| Data categories | <p>Company name, address, company registration code, VAT code, payment card data (card type, last four digits of card number, expiration date), Subscription Agreement;</p> <p>Name, surname, position, e-mail address, telephone number, and other information of the person responsible for the execution of the service contract;</p> <p>Name, surname, position, e-mail address, and telephone number of the employee who has been granted the right to use the Company's business account;</p> <p>When employees use the Services through Business Client accounts, all other data is collected and/or generated through the use of the Services and processed as specified for all other data processing purposes.</p> |
| Legal basis for data processing | <p>GDPR Article 6(1)(b) - Execution of the contract:</p> <ul style="list-style-type: none"> Conclusion and execution of the Subscription Agreement. <p>GDPR Article 6(1)(f) - Legitimate interest of the Company and third parties:</p> <ul style="list-style-type: none"> To process employees' Personal details in full extend. |
| Data retention period | <p>If the Account was terminated/deleted without using any MyBee Services – during the effective term of the Account and for a maximum period of 3 months after its expiry.</p> <p>After you have used the Services – during the entire Subscription Agreement validity and for 5 years after it ends.</p> |

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| | Chapter 8 of the Privacy Policy lists the cases and conditions when your Personal data may be stored or otherwise processed for longer. |
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14.15. STATISTICS, ANALYTICS, CUSTOMER BEHAVIOR RESEARCH

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| When are your personal data processed? | <p>To monitor, evaluate, analyse, improve, and improve the quality of the provision of Services, the Web App, offer new or new quality Services, increase the availability of the Services, increase the security of using the Services, improve the user experience using the Services, we analyse various statistical data. Data analysis actions performed for the purposes described in this section have no legal or similarly significant effect on you.</p> <p>It is also important to mention that when performing analytics and statistics, we process non-personalized aggregated data and do not process your contact or other personalizing information. That is, analytical and statistical data do not allow the identification of a specific customer, are not linked to other data of the identified user, and are not combined into data sets based on a particular customer.</p> |
| Data categories | <p>Vehicle reservations, location and time of their locking/unlocking, Vehicle information, Vehicle GPS data, route, speed, travel distance, duration, fuel and fuel card usage, other travel parameters, travel history, telemetry data, all other data generated during the Services, which are created and used in our activities only as statistical data and are not connected to specific Client.</p> <p>Analysis of your Account information such as age, country, city, and frequency of use of Services.</p> |
| Legal basis for data processing | <p>GDPR Article 6(1)(f) - Legal interests of the Company and third parties:</p> <ul style="list-style-type: none"> • To follow performance results and analyze them; • To implement and use data analysis and processing modules and methods to create and increase value for the Client and the Company; |
| Data retention period | <p>Created sets of statistical documents are stored for no longer than 36 months after data generation (some analytics do not require a long data retention period, so they can be deleted earlier).</p> |

14.16. WEBSITE ADMINISTRATION, SERVICE, IMPROVEMENT

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| When are your personal data processed? | <p>When you visit and browse our Website, to collect statistical data and improve the quality of the Service and the experience of visitors, we process the data of the cookies used on the Website and analyse them using the analytical service Google Analytics, which allows you to record and analyse statistical data on the use of the website. More information about Google Analytics and the information collected by its tools can be found here: https://support.google.com/analytics/answer/9019185?hl=en&ref_topic=2919631#zippy=%2Cin-this-article. You can find more information about the cookies used on the Website in our Cookie Policy.</p> |
| Data categories | <p>IP address, MAC address, date of visit, duration, pages visited, devices and programs used for Internet browsing, etc.</p> |
| Legal basis for data processing | <p>GDPR Article 6(1)(a) – Consent:</p> <ul style="list-style-type: none"> • To manage your data when you have agreed that we will track your actions on the Website with the help of cookies. |

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| Data retention period | See in the Cookie Policy. |
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14.17. ORGANIZATION OF COMPETITIONS, EVENTS AND ADVERTISING CAMPAIGNS

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| When are your personal data processed? | <p>When you participate in our various contests, games, events and advertising campaigns, we collect and process your personal data in order to include you in the selected contest activities. Also, when conducting public events and/or advertising campaigns in which you participate, we also additionally create various filmed and photographed materials, which we use to increase awareness of our activities. If you were captured during a public event, then we may use your image (in a limited sense) for the representative purposes of that event.</p> <p>If you participated in a photo session and/or filming organized by us, then we will use your image (in a broad sense) for advertising purposes and we will enter into an appropriate agreement with you regarding the use of the image.</p> |
| Data categories | <p>Name, surname, e-mail address, tel. number, post comments, post shares, information about being discussed in the network account and "following" in the social network account, reactions to the post, photo, message, time of receipt, message content, messages to messages, reply to reply, submission of reply to reply, time, event participation information, rating information, photos or videos - if they are for the competition as part of the conditions of participation.</p> <p>When the image can be seen in a photograph, the image and/or sound recording in the video material, the event, the event data.</p> |
| Legal basis for data processing | <p>GDPR Article 6(1)(a) – Consent:</p> <ul style="list-style-type: none"> Monitoring the implementation of the conditions of tender participants and in case of contact with the winner; <p>Photo shoots and other advertising campaigns and sharing the results.</p> <p>GDPR Article 6(1)(b) - Execution of the contract:</p> <ul style="list-style-type: none"> Conclusion and execution of the lottery (contest) contract. <p>GDPR Article 6(1)(f) – Legitimate interest:</p> <ul style="list-style-type: none"> To capture and use images and/or videos from events organized by us for representational purposes. |
| Data retention period | <p>Contest participants' data is stored for 1 year from the date of announcement of the contest winner.</p> <p>In case of public events and advertising campaigns, the created results are made public – 5 years from the day of the event or the day of giving consent.</p> <p>The created results are stored for campaign archiving purposes – 10 years.</p> |

END OF THE PRIVACY POLICY.