

Privacy policy of the Site www.CarAmigo.co

1. General provisions

CarAmigo SA (hereinafter **CarAmigo**), the publisher of the website www.CarAmigo.co, collects personal data of its Members, through the Website.

The collection and processing of Website's Users and/or Members personal data are carried out under the responsibility of **CarAmigo**, who is the only controller. The personal data is required particularly for: Members signups, the establishment of the connection between the Owners and Potential Drivers, as well as for insurance & assistance purposes related to the Vehicles. Users are informed that without their consent **CarAmigo** will be unable to identify them, take into account the creation of their profile and therefore grant them membership eligibility.

Apart from the third parties listed below and the Members themselves **CarAmigo** agrees not to disclose such information to other third parties. The data will be used by **CarAmigo**'s internal departments for, among others, the processing of booking requests and Rentals or in order to customize and enhance communication, including letters / emails, and information, as well as to enhance the Website based on Members' preferences.

CarAmigo does not remit, sell, commercialize or rent information about its Members to third parties. In case personal data is used by third parties other than the authorized third parties listed below, **CarAmigo** shall inform its Members in advance in order to enable them to exercise the right to oppose such usage.

CarAmigo may also provide consolidated statistics, concerning its Members and website analytics to trustworthy third parties, but these statistics shall not include personal data. The present shall not, however, be construed as preventing the assignment or business transfer to third parties.

2. Duration of retention

CarAmigo shall retain the personal data only for the time reasonably necessary for the purposes pursued and in accordance with legal and regulatory requirements. When the personal data is collected and processed within the framework of the execution of a contract, the data of the Member shall be kept at most 3 years after the end of the contractual relation which links the Member to **CarAmigo**.

At the end of the retention period, **CarAmigo** shall make the necessary efforts to ensure that personal data has been made unavailable or anonymous.

3. Right to access and correction

Pursuant to the General Data Protection Regulation n° 2016/679 of the European Parliament on the protection of individuals with regard to the processing of personal data and on the free movement of such data, the Members may exercise their right to access their file and rectify the information concerning them, by accessing the "My profile" section. Moreover, pursuant to the same provisions, the processing of personal data collected through the Website has been notified to the Privacy Commission. **CarAmigo** SA is registered as the controller of the personal data processing (number 1410427257511). Within the company, the person responsible for the personal data processing and for answering the Members' inquiries on that subject is Alex Gaschard, info@sharonomy.eu.

3.1. Acces to personal date & copies

Upon a request sent by mail or electronically to **CarAmigo**, the Member may, after having proven his identity, obtain free of charge the written communication or a copy of his personal data that have been collected. The information will be provided in an electronic form.

CarAmigo may charge a reasonable fee based on administrative costs for any additional copies requested by the Member.

The copy of the data will be communicated to the Member no later than one month after receipt of the request. This period can be extended by two months, given the complexity and the number of requests. **CarAmigo** will inform the Member of this extension and the reasons for the delay within one month of receipt of the request.

3.2. Right of rectification

Upon a request sent by mail or electronically to **CarAmigo**, the Member may, after having proven his identity, obtain free of charge, as soon as possible and at the latest within one month, the rectification of his personal data which would be inaccurate, incomplete or irrelevant, as well as supplementing such if proven to be incomplete.

Such rectification shall be undertaken no later than one month after receipt of the request. This period can be extended by two months, given the complexity and the number of requests. **CarAmigo** will inform the Member of this extension and the reasons for the delay within one month of receipt of the request.

3.3. Right to oppose the processing

Upon a request sent by mail or electronically to **CarAmigo**, the Member may at any time, for reasons related to his personal situation and after having justified his identity, oppose the processing of his personal data free of charge, where such processing is necessary for the legitimate interests pursued by **CarAmigo** or a third party.

CarAmigo may refuse to enforce the Member's right to oppose when it establishes compelling and lawful grounds for the processing, which override the interests or rights and freedoms of the Member.

CarAmigo shall respond to the Member's request as soon as possible and at the latest within one month and shall give the reasons when it intends not to proceed with such a request. This period can be extended by two months, given the complexity and the number of requests. **CarAmigo** will inform the Member of this extension and the reasons for the delay within one month of receipt of the request.

3.4. Right to limit the processing

Upon a request sent by mail or electronically to **CarAmigo**, the Member may, after having justified his identity, obtain the limitation / suspension of the processing of his personal data in the cases listed below:

- when the Member disputes the accuracy of a data and only the time that **CarAmigo** can control it;
- where the processing is unlawful and the Member prefers the limitation of processing to the erasure;
- where, while no longer necessary for the pursuit of the purposes of the processing, the Member needs it for the establishment, exercise or defense of its rights in court;
- during the time necessary to examine the merits of a request for opposition made by the Member, in other words the time that **CarAmigo** carries out the verification of the balance of interests between the legitimate interests of **CarAmigo** and those of the Member.

Where the processing has been suspended in accordance with this provision, the personal data of the Member may, except for retention, be processed only with the consent of the Member, or for the purpose of recognition, exercise or or the defense of rights in court, or for the protection of the rights of another natural or legal person, or for important reasons of public interest of the European Union or one of its Member States.

CarAmigo will inform the Member when the limitation / suspension of processing is waived.

3.5. Right to be forgotten (right of erasure)

Upon a request sent by mail or electronically to **CarAmigo**, the Member may, after having justified his identity, obtain the deletion of his personal data, when one of the following reasons applies:

- the data is no longer necessary for the purpose of the processing;
- the Member withdrew consent to have their data processed and no other basis for the processing;
- the Member objects to the processing and there is no compelling legitimate reason for the processing and / or the Member exercises its specific right of objection in relation to direct marketing;
- the personal data have been subject to unlawful processing;
- personal data must be erased in order to comply with a legal obligation (of Union law or the law of the Member State) to which **CarAmigo** is subject.

The deletion of data is however not applicable in the following cases:

- when processing is necessary for the exercise of the right to freedom of expression and information;
- where the processing is necessary to comply with a legal obligation which requires the processing provided for by the law of the Union or by the law of the Member State to which **CarAmigo** is subject;
- when the processing is necessary for the recognition, exercise or defense of rights in court.

CarAmigo shall respond to the Member's request as soon as possible and at the latest within one month and shall give the reasons when it intends not to proceed with such a request. This period can be extended by two months, given the complexity and the number of requests. **CarAmigo** will inform the Member of this extension and the reasons for the delay within one month of receipt of the request.

The Member also has the right, under the same conditions, to obtain at no cost the deletion or the prohibition of use of his personal data which, considering the purpose of the processing, would be incomplete or irrelevant or of which recording, communication or preservation would be prohibited or that would have been retained beyond.

3.6. Right to data portability

Upon a request sent by mail or electronically to **CarAmigo**, the Member may, after having justified his identity, request to receive his personal data in a structured, commonly used and machine readable format free of charge, in particular to transmit to another data controller, where:

- data processing is performed using automated processes; and when
- the Member has consented to this data processing, or where the processing is necessary for the performance of a contract to which the Member and CarAmigo are parties.

Under the same conditions and under the same conditions, the Member has the right to obtain from **CarAmigo** that his personal data be transmitted directly to another person responsible for the processing of personal data, provided that this technically feasible.

4. Cookies and web beacons

The Website uses "cookies". Cookies are small text files transferred to the User's hard-disk. They aim at tracking the Member's previous Website usage.

Furthermore, cookies are used by **CarAmigo** to personalize the service offered to the Members. The Members have the possibility to configure their browser to reject cookies. By doing so, they choose not to personalize the service offered by **CarAmigo**.

Certain web pages of the Website may contain electronic images or "web beacons", allowing counting the number of the page visitors. Those web beacons may be used by some of the partners of **CarAmigo**, for instance to measure and improve the efficiency of certain actions. The information obtained through those buoys simply allows compiling statistics related to the frequenting of certain pages of the Website, in order to better serve Members.

5. Authorised third-parties having access to the personal data

The personal data may be remitted to the following third parties, all of which stakeholders within the services of CarAmigo:

- The **Assistance Partner**: the assistance company partnering with **CarAmigo** to cover each Rental with a specific roadside assistance policy. Its name, address & company registration number can be found in Article 5.1 of the General Terms & Conditions
- The **Electronic Money Institution**: the electronic money institution partnering with **CarAmigo** to secure the payment between the parties. Its name, address & company registration number can be found in Article 6 of the General Terms & Conditions
- The **Insurance Partner**: the insurance company partnering with **CarAmigo** to cover each Rental with a specific insurance policy. Its name, address & company registration number can be found in Article 5.2 of the General Terms & Conditions

The authorised third parties may use the above-mentioned data only for the following purposes:

1. Moderation & monitoring of Members if the third party intervened in this process as external contractor, as defined in Article 3.7.2 of the General Terms of Use
2. To verify the status of a Member, and determine if the latter or the passengers or the vehicles can benefit from the guarantees set out in article 5 of the General Terms of Use
3. To perform business development in order to encourage some Members to purchase roadside assistance and/or insurance services and/or any product or service provided by one of the above-mentioned third parties

Any other use of the data from the **CarAmigo's** Member database by the authorized third party is prohibited. All personal data related to **CarAmigo** Members will be treated under strict confidentiality by every authorized third party, committed to make all efforts to ensure the security and confidentiality of data to which it has access, use it exclusively within the scopes described above.