

# Privacy Policy

*This is Effective as of Date: March 2018.*

We are committed to take all necessary and reasonable steps to protect the privacy of your information and will only disclose such information for identifying you as a driver the purpose of the Services offered. We provide this privacy statement in relation to your use of the App and/or Services (the "Privacy Policy") to provide you with clarity and transparency on how we collect, use, disclose and safeguard your private information and your right to privacy. Your acceptance of this Privacy Policy constitutes an authorization and approval for the use of your Personal Information and Collected Information pursuant to the terms and conditions set forth hereinunder.

## **1. Personal Information**

Subject to creating a User account in accordance with our Terms and Conditions, at the time of registration, you will be required to provide information about yourself, which may include, but is not limited to, (a) personal information, such as your ID, name, gender, date of birth; (b) contact information, such as your email address, physical address, phone number, etc., (c) driving information, such as your driver's license, additional drivers' permits, etc., in addition to other personal information that you choose to share with us or that is required to allow us to provide the Services to you (collectively, the "Personal Information"). You may still access and use some of the Services if you choose not to provide us with any Personal Information, but some features of the Services may not be accessible to you if you choose not to provide us with required Personal Information.

When you submit your Personal Information, you agree to engage us to maintain your account for you so that you may then search and select vehicles and securely communicate with us about rentals and related Services. You specifically authorize Shift, its directors, officers, employees, agents, contractors, web developers, service providers, and others operating on its behalf to use or disclose your Personal Information (or someone else's Personal Information on their behalf whom you have authorization to provide such information) in accordance with this Privacy Policy. You agree that we may use this Personal Information to provide the Services, improve and/or update the App and/or its User experience, contact you via SMS directly regarding your rentals or any other actions required to provide the Services. You further agree to provide Shift with your current

contact information, including phone number, and take all reasonable steps to notify Shift if and when this information changes.

You acknowledge and agree that if you provide any Personal Information of any additional driver through your User account for the purposes of the Services offered, such conduct constitutes the affirmative acknowledgement and agreement of the particular driver and their consent to the Terms and Conditions and Shift may use, collect and/or disclose such driver's Personal Information in accordance with terms of this Privacy Policy.

## **2. Payment Information**

As you make a payment through our App as per our payment terms in the Terms and Conditions and your Rental Agreement, your payment card information is processed by a third-party payment processing partner, such as \*\*\*\*\*. Our payment processing partner collects your provided payment card information necessary to process your payment. Such third-party's use and storage of information it collects is governed by its applicable terms of service and privacy policy.

## **3. Collection of Traffic Data**

We also may automatically collect certain data when you use the Services, such as (a) IP address; (b) domain server; (c) type of devices used to access the Services; (d) web browsers used to access the Services; (e) webpage or other source through which you accessed the Services from; (f) geolocation information and other statistics and information associated with the interaction between your browser or device and the Services ("Traffic Data").

## **4. How We Collect Your Information**

We collect information, including Personal Information, Payment Information and Traffic Data ("Collected Information"), when you use and interact with the Services, and in some cases from third-party Apps. Such means of data collection include the following:

- when you use the Services' interactive tools and services, such as searching and selecting vehicles, and upload documents and photos;

- when you voluntarily provide information in free-form text boxes through the Services or through responses to surveys, questionnaires, ratings and other;
- if you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device for the purpose of providing you the relevant Services, such as information regarding when you are logged on and available to receive updates, reminders, alert or notices;
- if you download our mobile application or use a location-enabled browser, we may receive information about your location and mobile device, as applicable;
- through cookies, web beacons, App analytics services and other tracking technology;
- when you use the “Contact Us” function on the App, send us an email or contact us by any mean.

## **5. How We Use Collected Information**

Shift only uses Collected Information to facilitate providing the Services, and to develop and improve the App User experience. In addition, Shift may use Collected Information to send you notifications, reminders, alerts, or notices and other related activities to the Services, and promotions from time to time. Aside from using such information to provide the Services, Shift may use them to help improve the Services or User experience, develop new Services, and to advertise for Shift in other Apps. Specifically, such use may include but is not limited to any of the following:

- provide you with Services or information you inquire about or request;
- respond to emails and correspondences we receive from you;
- send you notifications about Services, vehicles, rental offers or other resources and Contents that may be of interest to you, according to your preferences;
- contact you for any activity related to the Services, such as sending you reminders for upcoming bookings, sending you alerts to pick-up and drop-

off your vehicle, or notices regarding any activity occurring on your account;

- enhance your user experience, perform business analysis and improve or expand our Services; and
- prevent and investigate security cases and potential unauthorized or illegal activities.

## **6. Disclosure of Collected Information**

Shift will take reasonable measures to disclose any of the Collected Information in accordance with this Privacy Policy, and as necessary to perform the Services. Some of the Collected Information may be disclosed as the following:

- Shift shall be entitled to disclose such information its directors, officers, employees, agents, contractors, web developers, service providers, and others operating on its behalf, on a need to know basis, for the purpose of operating, designing, developing, and/or improving the Services and/or the App.
- certain Personal Information may be shared or disclosed with telematics devices to enhance your use of the Services. Shift will only disclose personally identifiable information to facilitate your communication with Shift.
- your Personal Information, Collected Information, and Traffic Data may be shared or disclosed with third-party partners who perform necessary operational services, such as billing, data storage, insurance verification, security, App analytics, User experience improvement and/or development, Service development, and/or who make certain services features available to our Users.
- your information may be transferred or provided to another company in the event of a merger, sale, acquisition or change of ownership or control by or of Shift, whether in whole or in part. Upon such occurrence, we will make reasonable efforts to notify you before your information becomes subject to different terms and privacy policies.
- Shift may be required disclose your Personal Information or any Collected Information if, upon Shift sole discretion in good faith, such disclosure is

important to (a) comply with applicable laws, regulations, or court judgement; (b) protect any right entitled to you, Shift, or any other party; (c) enforce this Agreement or the Rental Agreement; (d) to the extent necessary to respond to any action as a result of any posting or content that violates third-party rights.

In no event will any content in open reviews, ratings or online discussion be private and is treated as public information. Shift reserves the right to disclose such information in any way and by any means it deems appropriate. We encourage you to review any Personal Information you chose to disclose publicly, as Shift is unable to control any use of such information by third parties.

## **7. Security and Storage**

Shift undertakes to perform all necessary measures to meet strong data storage and security standards. A secure server is used to store Collected Information or any sensitive information you submit to us, protect its transmission through firewalls and encrypt it via Secure Socket Layer (SSL) technology. Although we attempt to security store and safeguard your information, we do not guarantee the security of your information and cannot prevent any breaches by third parties. If we have reasonable doubts that your information has been compromised, will try to promptly notify you of the situation

## **8. Updates**

Shift reserves the right to modify and revise this Privacy Policy or any of its other policies that it may post from time to time and in its sole discretion. Any modifications will be deemed effective immediately and incorporated by reference into this Privacy Policy or any other policies. Upon any such change, Shift will provide the amended terms on the App and may also attempt to notify you via other means. Shift encourages you to periodically review the App for updates, as they may Shift important changes affecting your legal rights. You acknowledge and agree that your continued access to or use of the App and/or Services after the effective date of any modifications to this Privacy Policy or any other policies constitutes your affirmative acceptance of the modifications. If at any time you choose not to accept this Privacy Policy after such modifications, then you must stop using the App and/or Services.

## **9. How to Contact Us**

If you have any comments, concerns or inquiries about this Privacy Policy, please contact us at [info@shiftinc.com](mailto:info@shiftinc.com) or at 920014818