

PRIVACY POLICY

1. BASIC INFORMATION

Data Controller	CAR SHARING MOBILITY SERVICES ITALY s.r.l.
Purposes of processing	<ul style="list-style-type: none"> • Management of Service Users, Service provision and, in general, management, development and compliance with the established relationship • Pre-registration. • Transactional management of the service • Customer and consumer service. • Profiling with internal sources • Data analysis operations • Compliance with legal obligations related to the Service • Marketing communications • Third party marketing communications • Promotion management. • Geolocation. • Fraud prevention. • Processing and management of images collected in case of road accident. • Analysis of the user's driving and identification of high-risk events.
Categories of data	<ol style="list-style-type: none"> 1. Identifying and contact data; 2. Personal characteristics; 3. Social circumstances; 4. Academic and professional data; 5. Commercial information; 6. Economic, financial and insurance information; 7. Transactions of goods and services; 8. Other categories of data; 9. Data derived from the use of the service; 10. license plates and images of stakeholders.
Origin of the data	<ul style="list-style-type: none"> • Personal data provided by Users • Personal data obtained as a result of the use of the App by Users. • Where appropriate, external sources, meaning entities different than ZITY.

Profiling	<ul style="list-style-type: none"> • For the purpose of sending Users personalised commercial communications adapted to their needs, preferences and personal circumstances. • For the purpose of performing analysis and data analytics operations in relation to user activity based on external sources. • For the purpose of ensuring the safety of property and individuals, identifying high-risk behaviours.
Rights of data subjects	Access, rectification, erasure, restriction of processing, opposition, portability, opposition to automated individual decisions and revocation of consent.
Additional information	Additional and detailed information regarding the processing of personal data is provided below.

1. ADDITIONAL INFORMATION ON DATA PROTECTION

This Privacy Policy governs the processing of data that CAR SHARING MOBILITY SERVICES ITALY s.r.l. (hereinafter, the **Company** or **ZITY**) carries out through its application (hereinafter, the **App**) and/or website for the provision of the multi-user vehicle leasing service (carsharing) that it provides within a given operating zone based on the availability of vehicles (hereinafter, the **Service**). This Policy forms an integral part of the [General Terms and Conditions of Use](#). ZITY advises the User to read our Privacy Policy carefully.

The User warrants that the information provided is true, accurate, complete and up-to-date, and shall be liable for any damages, direct or indirect, that may result from a breach of this obligation. In the event that the User provides personal data relating to third parties, he guarantees that he has informed them of the content of this privacy policy and has obtained their prior consent to provide their personal data or has another valid legal basis. The Company reserves the right to request documentary evidence in this regard to verify compliance with this obligation.

With regard to the personal data requested through the forms enabled in the App, it is the User's obligation to provide at least those marked with an asterisk, since if such data deemed mandatory is not provided, the Company will be unable to accept or process the request.

The Company may amend this Privacy Policy whenever it considers it necessary. In the event that the Privacy Policy is modified, notice will be provided through the Company's App or website or through other means of communication to ensure that all Users are informed of the new privacy terms applicable to the Company's Services. Your continued use of the Services after we have notified you of changes to our Privacy Policy will be deemed to constitute your acceptance of the new terms and conditions, except for data processing purposes where your consent is required.

Who is the data controller of the personal data of the user?

Data controller identity: **CAR SHARING MOBILITY SERVICES ITALY s.r.l.**

Registered tax number: **12278290965, VAT no. 12278290965**

Registered Address: **Via Guido Capelli 12, Milano (MI) 20126**

Contact address: : **Via Guido Capelli 12, Milano (MI) 20126**

E-mail: ciao@zity.eco

The Company has appointed a Data Protection Officer ("DPO"), who may be contacted (in addition to the Data Controller), for any request concerning the processing of personal data, by sending an email to the following address: dpoitmilan@zity.eco or Via Guido Capelli 12, Milano (MI) 20126.

For what purpose do we process the personal data of the user and with what lawful basis?

The personal data that the User provides to us may be processed by the Company for any of the purposes detailed below, depending on the type of data provided to us, the legal basis and the interactions that the User performs through the Service:

1. User management:

- **Purpose:** Provision, management, optimisation, customization and monitoring of the Service, as well as provision of assistance to the User. Identification of the user and verification of compliance with the necessary requirements for the rental of vehicles without a driver.
- **Data processed for this purpose:** Identifying and contact data; Economic, financial and insurance data; Transactions of goods and services; Other categories of data; Data derived from the use of the service.
- **Lawful basis for processing:** Data processing is necessary for the execution of pre-contractual measures taken at the request of the data subject or for the performance of a contract.

2. Pre-registration:

- **Purpose:** Identification of the User and verification of compliance with the requirements for

leasing vehicles without a conductor.

- **Data processed for this purpose:** Identification and contact data; Economic, financial and insurance data; Transactions of goods and services; Other categories of data; Data derived from the use of the service.
- **Lawful basis for processing:** Data processing is necessary for the execution of pre-contractual measures taken at the request of the data subject or for the performance of a contract.

3. Transactional management:

- **Purpose:** Management of collection, payments, non-payments, invoicing, claims, accidents and administrative infringements. And, in general, any type of transactional management necessary for the provision of the service. In connection with the management of the Service's payment gateway, the data may be transferred internationally to a processor located in the USA (PayPal, Inc.), which provides appropriate contractual guarantees on the basis of European regulations. If you choose the option to save your payment (card) data, we inform you that your payment data will be retained and will be auto-completed for subsequent rentals, so that you do not need to enter your payment data for each new process, and they will be considered valid and valid for subsequent rentals. The card's security code (CVV or CVC) will only be used for the current rental. Users may modify or delete their cards at any time through the My Account - Payments and Promotions section.
- **Data processed for this purpose:** Identifying and contact data; Economic, financial and insurance data; Transactions of goods and services; Other categories of data; Data derived from the use of the service.
- **Lawful basis for processing:** Data processing is necessary for the execution of pre-contractual measures taken at the request of the data subject or for the performance of a contract.

4. Customer and consumer service:

- **Purpose:** Attention to requests, complaints, suggestions or claims related to the provision of Carsharing services.
- **Data processed for this purpose:** Identifying and contact data; Other categories of data.
- **Lawful basis for processing:** Data processing is necessary for the execution of pre-contractual measures taken at the request of the data subject or for the execution of a contract.

5. Profiling with internal sources:

- **Purpose:** In order to send Users personalized marketing communications tailored to Users'

needs, preferences, and personal circumstances, ZITY may collect information about a User's use of the Carsharing Services, solely with internal data, as well as analyze the User's characteristics or behavior patterns, in order to predict the User's behavior regarding the use of the Carsharing Services. Profiling with data from internal sources may include performing operations to optimise the provision of the App Services and improve the quality of the App.

- **Data processed for this purpose:** Identifying and contact data; Personal characteristics; Transactions of goods and services; Other categories of data; Data derived from the use of the service.
- **Lawful basis for processing:** Legitimate interest of the Company in improving our commercial offer by providing our customers with products and services adapted to their personal characteristics and preferences. In this regard, the consequence of this exercise is the offer of products and services tailored to what the Company considers may be of interest to you. You may request further information on how we have assessed our legitimate interest and your own interests by contacting us at dpoitmilan@zity.eco.

6. Data analysis operations:

- **Purpose:** Based on the consent of users, the Company may perform analysis and data analytics operations in relation to user activity, as well as profiling with data from external sources in order to improve the quality of the Service, including predictive and mobility modelling.
- **Data processed for this purpose:** Identifying and contact data; Personal characteristics; Social circumstances; Academic and professional data; Commercial information; Transactions of goods and services; Economic, financial and insurance data; Other categories of data; Data derived from the use of the service.
- **Lawful basis for processing:** Consent of data subject.

7. Compliance with the Company's legal obligations in relation to the Carsharing and Mobility Services:

- **Purpose:** Fulfilment of the Company's legal obligations in relation to Services, provided that the processing of User data is necessary for this purpose.
- **Data processed for this purpose:** Identifying and contact data; Economic, financial and insurance data; Transactions of goods and services; Other categories of data; Data derived from the use of the service.
- **Lawful basis for processing:** Compliance with legal obligations.

8. Marketing communications:

- **Purpose:** The Company may send its own commercial communications to Users in order to promote the use of the Service and share content related to the Services.

- **Data processed for this purpose:** Identification and contact details.
- **Lawful basis for processing:** Legitimate interest of the Company to arouse interest and promote the purchase of our products and services and to enhance the image of the Company. You may request further information on how we have assessed our legitimate interest and your own interests by contacting us at dpoitmilan@zity.eco.

9. Third Parties Marketing Communications:

- **Purpose:** Based on the consent of the Users, the Company may send commercial communications from third parties to the Users, in order to promote products and/or services of third parties related to the following sectors of activity: manufacturing industry; electricity, gas, steam and air conditioning supply; wholesale and retail trade, repair of motor vehicles and motorbikes; transport and storage; hotel and catering; information and communications; financial and insurance activities; professional, scientific and technical activities; administrative and support service activities; health and social work activities; and artistic, recreational and entertainment activities.
- **Data processed for this purpose:** Identification and contact details.
- **Lawful basis for processing:** Consent of data subject.

10. Management of promotions:

- **Purpose:** Management of promotions and the participation of Users in them, including providing the User with information on the promotional activity in question and compliance with the Company's legal obligations arising from the development of promotional activities.
- **Data processed for this purpose:** Identification and contact details; Data derived from the use of the service.
- **Lawful basis for processing:** Data processing is necessary for the execution of pre-contractual measures taken at the request of the data subject or for the execution of a contract.

11. Geolocation:

- **Purpose:** In order to provide services, the Company may require the use of geolocation data of Users.
- **Data processed for this purpose:** Identifying and contact data; Other categories of data.
 - **Lawful basis for processing:** Data processing is necessary for the execution of pre-contractual measures taken at the request of the data subject or for the execution of a contract.

12. Fraud prevention:

- **Purpose:** Management and development of fraud prevention and control activities.
- **Data processed for this purpose:** Identifying and contact data; Social circumstances; Transactions of goods and services; Other categories of data; Data derived from the use of the service.
- **Lawful basis for processing:** Legitimate interest of the Company in not being a victim of fraud. You may request further information about how we have assessed our legitimate interest and your own interests by contacting us at dpoitmilan@zity.eco.

13. Processing and management of images collected in case of road accident.

- **Purpose:** In the event of traffic accidents, the vehicle's sensors may activate the cameras installed on the front of the vehicle to capture the images necessary to process any claims arising from the event. No sounds will be recorded, only twenty seconds of video will be captured, and these images will be managed to guarantee the legal protection of the Company.
- **Data processed for this purpose:** Data derived from the use of the vehicle -for the activation of the cameras-, license plates and images of stakeholders. The image of the interior of the vehicle and sounds will not be collected.
- **Lawful basis for processing:** Legitimate interest of the Controller in ensuring the effective legal protection of the Company. You may request further information about how we have assessed our legitimate interest and your own interests by contacting us at dpoitmilan@zity.eco.

14. Analysis of the user's driving and identification of high-risk events.

- **Purpose:** Identification of high-risk events that are collected through the devices installed in the vehicle to inform the user when dangerous situations are detected (such as short distance with the vehicle in front, high speed, large accelerations, braking and sharp turns), to warn the user of them by means of acoustic signals and/or voice messages. Hazardous events will be recorded in the Company's systems and, if applicable, may result in the charging of an additional fee and/or the blocking of the account of users who violate the terms of service.
- **Data processed for this purpose:** Data derived from the use of the vehicle and identification data.
- **Lawful basis for processing:** Legitimate interest of the Controller to ensure the safety of users and the security of property and vehicles. You may request further information about how we have assessed our legitimate interest and your own interests by contacting us at dpoitmilan@zity.eco.

From which sources does the personal data we process come?

The personal data processed by the Company as a result of interactions carried out by Users through the App come from the following sources:

- Personal data provided by Users through the forms made available by the Company.
- Personal data obtained as a result of the use of the Services by Users, including vehicle safety sensors.
- Subject to consent, from external sources, i.e., from parties outside ZITY.

To whom are your personal data communicated?

The Company informs you that your data may be communicated to the following entities in accordance with the legitimate basis of the communication:

- For the purpose of the proper performance of the contractual relationship, we may communicate your data to:
 - Insurance companies, for the management of claims and/or accidents.
 - Financial institutions and payment gateways, for the management of collections and payments.
 - Auxiliary companies or third parties, such as those dedicated to the provision of identification services for any urban parking spaces, based on the User's location, for which the User must have requested the provision of the service from the aforementioned third parties.
- In order to comply with applicable legal obligations, we may disclose your data to:
 - Tax Agency and other competent administrations, for the fulfilment of tax obligations.
 - Competent public administrations, for the identification of drivers in compliance with the applicable regulations.
 - Other public administrations and/or competent authorities, such as State Security Forces and Corps, to the extent necessary and/or as required by the applicable regulations.
- On the basis of our legitimate interest in ensuring the continuation of our activities in the context of transfer or other transactions, we could communicate your data to the following actors:
 - acquirers, successors or assignees of our company in connection with a merger, acquisition, debt financing, sale of assets or similar transaction, or in the event of a collective proceeding during which information would be passed to one or more third parties among our business assets.

- In order to fulfil our legitimate interests, for example, in the case of accident image recordings, we may disclose your data to:
 - Insurance companies, for the management of claims and/or accidents.
 - Other public administrations and/or competent authorities, such as State Security Forces and Corps, to the extent necessary and/or as required by the applicable regulations.
 - Courts and tribunals.

The Company is supported by various service providers who act under its responsibility and on behalf of ZITY as "data processors", such as Google Cloud. You can obtain more information about our data processors by contacting us at dpoitmilan@zity.eco.

Likewise, the Company informs users that the personal data provided to us is stored in the European Economic Area (EEA). Notwithstanding the foregoing, if for the provision of any particular service, such as the management of payments through the payment gateway, an international transfer of data is necessary, the Company will cover such international transfer with one of the guarantees recognised under the applicable regulations, such as the signing of the standard contractual clauses approved by the European Commission. If the User wishes to obtain more information about data transfers, he/she may contact us by e-mail at the following address dpoitmilan@zity.eco.

How long do we retain your personal data?

The personal data provided will be kept for the period of time determined on the basis of the following criteria: (i) duration of the legal relationship and attention to any liabilities arising from such relationship; (ii) legal obligation of retention; and (iii) request for deletion by the data subject in appropriate cases. You may request further information about the retention periods by contacting us at dpoitmilan@zity.eco.

What are your rights as data subject?

The User has the right to access their personal data and to obtain confirmation of how we're processing them, as well as to request the **rectification** of inaccurate data or, where appropriate, request its **erasure** when, among other reasons, the data is no longer necessary for the purposes of processing they were collected for.

Under certain circumstances, data subjects may request the **restriction** of the processing of their data, in which case we will only keep them for the exercise or defense of claims. The User can also **oppose** to the processing of data based on grounds relating to their particular situation, in which case we will stop processing the data, except for compelling legitimate reasons or for the exercise or defense of claims.

In certain circumstances, the User may exercise the right to **data portability**, having the right to receive the personal data concerning him or her and provided to us, in a structured, commonly used and machine-readable

format and to transmit, without hindrance, such data to another Data Controller, where technically feasible.

The User also has the right not to be subject to a decision based exclusively on automated data processing, including profiling, which could produce legal effects on him or her or significantly affect him or her.

Finally, the User may **revoke** his or her consent at any time, in the event that the consent has been granted for a specific purpose, without affecting the lawfulness of the data processing, based on the User's consent granted prior to revocation.

Similarly, the Company reminds the User that he may object, at any time, to the processing of his personal data for commercial or promotional purposes.

In order to exercise the rights described or revoke the consents granted, the User may contact [-] indicating "Data Protection" as the subject or send an email to the following address: ciao@zity.eco. ZITY informs the User that, in order for the right exercised to be effective, additional documentation may be required as proof of the applicant's identity if he/she does not have less intrusive means at his/her disposal (e.g. a copy of his/her national identity document or passport).

For further information on the processing of personal data, the User may contact the ZITY Data Protection Officer (dpoitmilan@zity.eco). Likewise, the User may lodge a complaint with the competent data protection supervisory authority, which in Italy is the Garante per la Protezione dei Dati Personali.