



# Free2move

## PRIVACY POLICY

For the Free2move Group, Privacy is one of our priorities. Providing transparent information about how we process personal data is what we consider essential to enforce it. This page aims to give you an overview of

- Which of your information we process while we perform our services,
- How we use it, and for how long,
- With whom we may share some of your information and
- Your individual rights in relation to your personal data.

### Who is the Free2move Group, and what do we do?

The Free2move Group (“Free2move”, “us”, “we”) is a mobility provider - we offer several services linked to carsharing, car rental (Car-on-demand), fleet management and parking via both our App and our Websites.

Free2move is a group of companies, including two main entities: Free2move SAS (located in France), and SHARE NOW GmbH (located in Germany). These two main entities jointly decide why, and how your data is processed by us (e.g., via our Apps, and the services we offer). For this

reason, they act as Joint Controllers (as per. Art. 26 GDPR) and are both responsible to you under the law. Please read the sections below carefully for more information.

Free2move is part of the Stellantis Group.

## Where is the information relevant for you?

To help you navigate this page, we have categorized the following sections in accordance with the services we perform, and which involve the processing of personal information:

- You rent our cars for a short period: **Carsharing** (p.3),
- You have a subscription or rent our cars for a longer period: **Car-on-demand & Rent** (p.11),
- You are one of our partners and use our services to operate your fleet: **SaaS, Connect fleet** (p.17),
- You have purchased a Stellantis car including **Preventive maintenance** (p.18),
- You use our **Parking** services (p.22),
- You want to **apply for a job** within the Free2move Group (p.25),
- You are a **website visitor** (p.27).

## How to reach us for questions?

If you have any questions related to your personal information, our processing activities, or your individual rights, you can contact our Group Data Protection Officer via:

Free2move DPO,  
45 Rue Chaussée d'Antin,  
75009 Paris  
France

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## Carsharing (via our App)

We provide all Apps of the Free2move group based on our central technologies and for which the following privacy policy will apply.

### Which of your data do we process, and why?

#### Downloading and using our apps

When you download our apps, we receive following information by the respective app store:

- your username, email address, Device ID and time of the download.

This information is collected in line with the app store's privacy policy, and shared with us via automated means.

While you use our apps, we process your personal information including:

- your phone number and IP address, Device ID, name and operating system, app version, language, telecommunication provider and MAC address.

This machine-generated data is collected from your end-device via our logs and is technically necessary to display our app safely. To make sure we track and correct potential bugs and technical issues, we additionally process:

- information on the app usage and its functionalities, access and error logs, for security purposes.

In some cases, we may also process your **IDFA (“advertising identifier”)** for marketing purposes, a non-permanent ID linked to your device (provided by iOS). You can restrict advertising and tracking via your iOS or Apple operating system via the available privacy settings.

#### In-App Cookies and similar technologies

We use cookies and similar technologies (“cookies”) within our apps. Cookies are small files stored on your end device to retrieve and read certain information. While some are “strictly necessary” to provide our applications and cannot be opted out, some are considered “optional” and will only be placed on your end device if you consent to it. You can find more information on cookies and the possibility to revoke your consent via

our Cookie Policy. You can clear and delete cookies anytime via the corresponding settings available to you via your browser.

## App permissions

To provide all functionalities of our apps, certain permissions within your end device are required. If these permissions are disabled, you will not be able to use some of our functionalities. These permissions can be managed via your settings in your operating system, including:

- Location / GPS data (required to allow us to disclose you our nearby vehicles),
- Notifications (to allow us to send you push notifications about available rentals or events via our Radar),
- Bluetooth (must be activated to open or lock our vehicles).

When using our apps for the first time, you will be asked to log in via your user account for a one-time authentication. A token is processed for this purpose.

## Account creation

If you apply to register for a user account via our apps, we will collect and process following personal information:

- your full name, place and date of birth, your residential address, phone number, email, language, country in which you register,
- password, user login token,
- payment data, and, where relevant, promotional codes.

We process this information to review your request for an individual account and your eligibility to access our services, in line with both our legal and contractual obligations.

## Verifying your Driver's License

Free2move is required by local laws to verify that only individuals legally allowed to drive can rent our cars. To do so, we must conduct certain checks based on the driving license, both when you first join our services, and on an ongoing basis. These involve the processing of

- the biometric data entailed in your driving licenses via photographs (front and back) and a verification portrait picture (“selfie”) to verify its authenticity and your identity. To assist us in this process, and only in specific countries, we have chosen to engage with the following service provider, bound by the requirements applicable to data processors under Art. 28 GDPR: Onfido ([privacy policy](#)).

Our legal grounds for this processing activity can be found in our legal obligations including local laws related to traffic regulations, and to avoid our criminal liability as the keeper of the vehicles.

### Renting one of our Car

To close a rental contract for one of our car via our app, we may process following of your personal information:

- your login information, the personal data contained in your user account, the start and end position of the rental, the distance traveled in km, the time and the length of the trip.

The rental is started via the app and/or vehicle controls and potential error notifications may require you to perform some corrective actions (e.g., close a window left open) upon unlocking the vehicle.

To terminate the rent via the app, we will verify:

- if you are located within our authorized area to finalize the return of our car,
- if you have exceeded the permissible rental period, and
- the mileage and tank or load level

for invoicing purposes, in line with our terms and conditions.

### Accidents

In the event of an accident involving one of our cars, we may process your personal information in line with the rest of this privacy policy . We may forward this information to the relevant third parties, including insurances, law enforcement and/or in the context of the assessment, establishment, or defense of legal claims. This is done in line with our contractual and legal obligations.

## Geolocation

You can reserve a car via our apps for a certain period. For this purpose, we may process

- your location, to display our available cars located close to you,
- your location at the beginning of the rent, to show you which available car near you can be rented, and
- your location at the end of the rent, to verify that our car is parked in our permitted area.

This is done in line with our contractual obligations (for billing purposes, or to retrieve our cars after the rent) and to optimize the use of the vehicle fleet and our offers, in line with our legitimate interest.

## Telematic Data

While your rent is ongoing, geolocation information is generated and sent via our telematic boxes – this information is mostly “pseudonymous” (a privacy enhancing measure). We collect and process the following information:

- status of the locking system (including closed or open windows), speed and immobilizer, mileage counter, voltage detection of the on-board electrical system, tire pressure, tank capacity, safety systems (e.g., airbags), key holder and fuel card (if relevant).

This is done for the purpose of providing safe vehicles and the fulfillment of our contractual obligations. Depending on the car, this information is either collected by systems integrated within the cars by the respective car manufacturer (see “*Connected Car Services*” section below), and/or via telematic boxes provided by our partner INVERS, from the Fleet Technology ([privacy policy](#)).

## Connected Car Services

Depending on the model of the car, some connected services (e.g., to enter and find a specific destination, traffic services, connections for mobile end devices and entertainment offers) may be available during a rental. Your personal information may be collected while you use these services and sent to the respective vehicle manufacturer (OEM) – in such cases, the OEM acts as the Data controller, and your information is processed to offer

you the desired functionality, in line with your consent and the fulfillment of contractual obligations. Please ensure you delete your personal information when you leave our vehicles (e.g., by removing the entered address or the name of your connected end-device). For more information on the processing of your information by OEM via Connected Car Services, please refer to their respective Privacy Policies.

### Digital refueling

You can refuel some of our vehicles via our apps. When this is the case, you need to be within a radius of 100 – 300m of our partner petrol stations.

- Your location must be turned on for this functionality to work and will be processed.

For the purpose of invoicing fuel costs, preventing fuel fraud and misfuelling and answering to your potential questions we may additionally process

- transaction data (quantity refueled, costs), your master and telematics data (e.g., fuel level).

This is based on our contractual obligations and in the context of fraud prevention.

### Emergencies

If we have strong indicators or evidence of an (imminent) emergency for either a natural person or a car (including the theft, vandalism or destruction of our car, or if it leaves our permitted area), we may process additional following information in real time:

- your location, your contact details and the Telematic information for the purpose of locating our car or preventing its loss, an accident and/or to contact you.

We reserve ourselves the right to process additional information, depending on the nature, severity and the urgency of the situation. This is done in line with our T&Cs, applicable laws, and our own as well as our guests legitimate interest.

### How long do we keep your information?



As long as our relationship is ongoing, we will keep your information in line with applicable laws. Our logs which include Telematic data and information collected to detect any damages are deleted after 90 days where no damages or breach of our Terms and conditions have occurred. If you close your account, we will delete your personal information considering our legal obligations – please note these may require us to keep certain information for a specific period, for accounting, documentation, legal or reporting reasons. We may keep your information for up to 10 years after termination of the contract in line with the legal retention obligations applicable to us (e.g., under fiscal and commercial laws).

### **Do we share your information?**

We may transfer your information in line with applicable laws, by including and relying on appropriate and compliant transfer mechanisms (such as the inclusion of Standard Contractual Clauses, SCC's, where legally required), as well as on appropriate safeguards.

### **Law enforcement**

If you committed a legal offense or a breach of our Terms and Conditions during your rent, including parking violations, we may legally be required to share specific information, including,

- full names, phone numbers, emails, Driving licenses vehicles & rental data and any relevant information,

upon request of the local law enforcement agency, including local authorities responsible for traffic offenses, courts, local administrations, or police authorities, in line with our legal obligations. In the event of a breach of our Terms and Conditions, we reserve the right to share the relevant information required to establish, exercise, or defend our legal rights with authorities, external consultants or authorized third parties.

### **Our Group Companies/ Merger or acquisition**

Free2move may transfer your personal information within our group companies and to our personnel to ensure and optimize how we perform and deliver our services to you.

If you use our services via another Free2move Group local entity or our Franchise partners, your personal data may be forwarded to register and rent with the respective local Free2move Group entity (including your registration data), in line with Art. 6 1) b) GDPR.

If we are involved in a merger, acquisition, or sale of our assets, we will notify and inform you accordingly via email and/or a notification via our website of our organizational changes. We will also provide you with assistance regarding your individual rights.

### **Our Business partners and Service Providers**

We have chosen to work with third parties while delivering our services. In this context, personal information may be processed, and we have chosen our partners in line with their commitment to privacy and security. This is documented by corresponding contractual safeguards and the technical and organizational safeguards implemented and assessed in line with the latest legal requirements and guidance for the authorities. Our services providers include Financial and payment collection service providers, IT and security providers, insurance companies and brokers, Providers for maintenance and repairs of our cars, vehicle inspection and damage report providers and any business partner or supplier acting on behalf of Free2move.

### **Payment & Claims management**

We process and forward your payment information at the end of a drive (including your full name, email address, Customer ID, Credit card information and transactional data) to our payment service provider, which may be

- Adyen ([Privacy Policy](#)).

Where other payment methods are permitted, the respective terms of our partners shall apply in addition to ours and with behalf of the processing of personal information.

In the event of outstanding claims or payment default, we may rely on third parties for claims management. This may require us to forward the requirement information for the enforcement of these claims. This is done

based on our contractual obligations and in the context of fraud prevention.

### Customer service

You can submit a request to our customer service by email or telephone. We will process the personal information you provide us for the purpose of allocating, processing, and answering your request, in line with your consent and our contractual obligations. We may send surveys to assess your satisfaction with our services – in such cases, you consent to provide us with the data collected therein by entering it. You can revoke your consent anytime by contacting our customer service, or our DPO via [privacy@free2move.com](mailto:privacy@free2move.com).

We use CRM management tools: Braze ([Privacy Policy](#)) and Pipedrive ([Privacy Policy](#)).

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## Car rental (“Car-on-demand”)

Free2move offers an ongoing subscription model to enable you the flexibility to rent our cars for the period you choose and may process personal information in this context.

### Which of your data do we process, and why?

#### Closing a subscription and verifying your eligibility

If you submit a request to close a subscription, we will process your personal information, including:

- your full name, address, age, Driver’s License, email address,
- payment and solvency detail, guarantees

to process your request, verify your eligibility to rent one of our cars and for invoicing purposes. This is done in line with our contractual and legal obligations.

### Delivering our services to you

We process your personal information to provide you with our services on an ongoing basis, with or without time restriction. These may include the delivery of the car to a specific location, or to provide you with assistance via our support channels.

We may also be required to process the car position to provide you with assistance in the event of damage, accident, loss, theft, or problems of any kind to you, other individuals or to our car.

## Geolocation

While we deliver or retrieve our car to a chosen location, we will process this information accordingly to ensure our employee physically delivers or retrieves our car successfully. For this purpose, we may process

- the delivery location, at the beginning and the end of the rent, to deliver and retrieve our car.

This is done in line with our contractual obligations (for billing purposes, or to retrieve our cars after the rent). We may process additional data related to the location of our cars (in cases of interim interruptions) in line with our legitimate interest.

## Telematic Data

While your rent is ongoing in some of our vehicles, geolocation information may additionally be generated and sent via telematic boxes - this information is mostly "pseudonymous" (a privacy enhancing measure).

We may collect and process the following information:

- status of the locking system (including closed or open windows), speed and immobilizer, mileage counter, voltage detection of the on-board electrical system, tire pressure, tank capacity, safety systems (e.g., airbags), key holder and fuel card (if relevant).

This is done for the purpose of providing safe vehicles and the fulfillment of our contractual obligations. Depending on the car, this information may either be collected via systems integrated within the cars by the respective car manufacturer (see "*Connected Car Services*" section below), and/or via telematic boxes provided by Kuantic (read their [Privacy Policy](#) for more information).

Where this functionality is built in by the car manufacturer, our vehicles also provide with the means to “de-activate” the processing of geolocation information via a corresponding “Turn Off” button (“Mode Privé”) available in the vehicle.

### Connected Car Services

Depending on the model of the car, some connected services (e.g., to enter and find a specific destination, traffic services, connections for mobile end devices and entertainment offers) may be available during a rent. This can include the functionality to place an “SOS Call” in case of emergencies. Your personal information may be collected while you use these services and sent to the respective vehicle manufacturer (OEM) – in such cases, the OEM acts as the Data controller, and your information is processed to offer you the desired functionality, in line with your consent and the fulfillment of contractual obligations. Please ensure you delete your personal information when you leave our vehicles (e.g., by removing the entered address or the name of your connected end-device). For more information on the processing of your information by OEM via Connected Car Services, please refer to their respective Privacy Policies.

### Emergencies

If we have strong indicators or evidence of an (imminent) emergency for either a natural person or a car (including the theft, vandalism or destruction of our car, or if it leaves our permitted area), we may process additional following information in real time:

- your location, your contact and Telematic information

for the purpose of locating our vehicle, preventing an accident or its loss, and/or to contact you. This is done in line with our T&Cs, applicable laws, and in line with our own as well as our guests legitimate interest.

### Friend Referral Programs

If you use of one of our Friend Referral Programs, we collect and process data in line with the applicable Terms and conditions which are available for acceptance before submitting the referral. This is done based on your consent and our contractual obligations, for the purpose of providing the

benefits of our Friend Referral Programs and processing your related queries. Please note that we have no means to ensure the referred individual has given their consent to be referred. They can request for their information to be deleted anytime via email to [privacy@free2move.com](mailto:privacy@free2move.com).

### **Our business administration**

We process personal data to ensure our services are used in a non-fraudulent and compliant way, are not used to cause any harm to individuals including our users and our staff, and that our assets (such as cars) are held harmless, in line with our legitimate interest. If we have evidence leading us to believe you are or may be in breach of applicable laws, we may forward the required personal information to the relevant third parties and/or authorities.

### **How long do we keep your data?**

Free2move only retains personal information as long as necessary and legally required.

As long as our relationship is ongoing, we will keep your information in line with applicable laws. If you close your account, we will delete your personal information considering our legal obligations – please note these may require us to keep certain information for a specific period, for accounting, documentation, legal or reporting reasons. Generally, we may keep your information for up to 10 years after termination of the contract in line with the legal retention obligations applicable to us (e.g., under tax and commercial laws).

### **Do we share your information?**

We may transfer your information in line with applicable laws, by including and relying on appropriate and compliant transfer mechanisms (such as the inclusion of Standard Contractual Clauses, SCC's, where legally required), as well as on appropriate safeguards.

### **Law enforcement**

If you committed a legal offense or a breach of our Terms and Conditions during your rent, including parking violations, the Free2move Group may legally be required to share specific information, including

- full names, phone numbers, emails, Driving licenses vehicles & rental data and any relevant information

upon request of the local law enforcement agency, including local authorities responsible for traffic offenses, courts, local administrations, or police authorities. This is based on our legal obligations. In the event of a breach of our Terms and Conditions, we reserve the right to share the relevant information required to establish, exercise, or defend our legal rights with authorities, external consultants or authorized third parties.

### **Our Group Companies/ Merger or acquisition**

Free2move may transfer your personal information within our group companies and to our personnel to ensure and optimize how we perform and deliver our services to you.

If you use our services via another Free2move Group local entity or our Franchise partners, your personal data may be forwarded to register and rent with the respective local Free2move Group entity (including your registration data), in line with Art. 6 1) b) GDPR.

If we are involved in a merger, acquisition, or sale of our assets, we will notify and inform you accordingly via email and/or a notification via our website of our organizational changes. We will also provide you with assistance regarding your individual rights.

### **Our Business partners and Service Providers**

We have chosen to work with third parties while delivering our services to you and in this context, some of your personal information may be processed. Where this is the case, we have chosen partners in line with their commitment to privacy and security, documented by the corresponding contractual safeguards, the technical and organizational safeguards implemented. Please note that these safeguards are always assessed in line with the latest legal requirements and guidance for the authorities. These service providers include financial and payment

collection service providers, IT and security providers, insurance companies and brokers, providers for maintenance and repairs of our cars, vehicle inspection and damage report providers and any business partner or supplier acting on behalf of Free2move.

## Payment & Claims management

We process and forward your payment information at the end of a drive (including your full name, email address, Customer ID, Credit card information and transactional data) to our payment service provider, which may be

- For PayPal transfers: PayPal S.a.r.l et Cie, S.C.A ([Privacy Policy](#)).

In the event of outstanding claims or payment default, we rely on third parties for claims management. This is done based on our contractual obligations and in the context of fraud prevention.

## Customer service

You can submit a request to our customer service by email or telephone. We will process the personal information you provide us for the purpose of allocating, processing, and answering your request, in line with your consent and our contractual obligations. We may send surveys to assess your satisfaction with our services – in such cases, you consent to provide us with the data collected therein by entering it. You can revoke your consent anytime by contacting our customer service, or our DPO via [privacy@free2move.com](mailto:privacy@free2move.com).

We use CRM management tools: Braze ([Privacy Policy](#)) and Pipedrive ([Privacy Policy](#)).

## Mobility Card

You can use the Free2move Mobility Card to conduct payments in line with your individual needs. Free2move will process the following information to provide you/your employees with access to your Mobility Account:

- your identification and contact information (e.g., names, email addresses and phone numbers),
- your login details,



- Usage data linked to the Mobility Card,
- Payment related information including for the purpose of invoicing or enforcing promotions.

We process your and/or your employees' personal information in line with our contractual obligations and to enable to benefit from our Mobility Card's advantages, which may include:

- The use of a single payment method for all mobility provider,
- The allowance of individual mobility budgets and the possibility to monitor associated costs (for parking, fuel, train, plane, rentals...),
- The use of the mobility card for individual transactions linked to mobility expenses.

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## Fleets operation (SaaS), Preventive maintenance

Free2move offers a variety of digital solutions to administer your fleet.

### Which of your data do we process, and why?

#### Connect Fleet

To allow for the administration of your fleet via our online fleet management platform "Connect Fleet", we process your personal data, including

- your identification and contact information (e.g., names, email addresses and phone numbers),
- your login details,
- Data on the use of your vehicle fleet, including geolocation data, vehicle VIN, and car status information,
- data shared by the user, such as full names, phone numbers, emails, and vehicles of employees/drivers.

We process this information to provide you with our platform and allow you to manage your fleet in line with your wishes. This is done in line with our contractual and legal obligations.

## Fleet Sharing

To enable you to supervise and optimize the use of your fleet via our fleet management platforms and apps, we process following information:

- your identification and contact information,
- your login details for our online booking platform and our Fleet Sharing app,
- technical data related to your fleet (VIN),
- data shared by the users (full names, addresses of employees/drivers, geolocation data).

This is done to provide you and your employees with access to our platforms and apps,

track your fleet's needs, allow you and your employees to book your cars at all times and to lock or unlock our cars (by access card or smartphones).

This is done in line with our contractual and legal obligations.

## Preventive maintenance

Upon the purchase of a car (or a fleet) of one of the participating brands of the Stellantis Groups (our [parent company](#)), the service "Preventive maintenance" may be included in the following countries: Austria, Belgium, France, Germany, Italy, Nederland, Poland, Portugal, UK. This service is free of charge for a period of 4 years (starting the warranty date). Where this is the case, and for the Free2move Group to deliver this service to you, we may process:

- your contact details (name, email address), as provided directly by you during the purchase of one of the Stellantis car(s),
- If relevant: the name of the purchasing company and fleet,
- Country, language,
- technical data related to your car/fleet and its/their health, including: your VIN, status of its health related to breaks, voltage detection of the on-board electrical system, tire pressure, tank capacity, safety systems (e.g., airbags), key holder and fuel card (if relevant),
- Geolocation of the car, speed (& mileage counter),cap, CAN BUS data,
- "Eco driving" note & Standard fuel consumption (where relevant),

- Appointments required for the preventive maintenance of your vehicle/fleet.

We process this information to (i) activate our services, (ii) contact you via email about the activation of Preventive Maintenance for your car(s), (iii) send you warning notifications via your car where applicable and if all the conditions are met, (iv) enable the booking of appointments for maintenance purposes and (v) provide you with ongoing reports (via weekly and monthly reports).

We also provide the means to register via our Free2move platform to get access to additional services. Where this is the case, we may additionally process your

- contact detail (name, email address),
- login information (password).

We process this information in line with our contractual obligations found in the Terms and Conditions attached to your contract, which you can refer to for more information.

### How long do we keep your data?

We store this information for each car and/or the entire fleet, and in line with the timeframe defined by you. Where no such retention rules have been defined, we store this information until the user account is closed and for the duration of the service by-default, which corresponds to 4 years until the user account is closed. We store Geolocation information for a default period of two months, taking our legal retention obligations into account.

### Your Rights

You can request the change (via [contact-b2b-fr@free2move.com](mailto:contact-b2b-fr@free2move.com)) or the deletion of your personal information anytime, and in accordance with your individual Rights (see section below: "Your individual Rights").

You can unsubscribe from this service anytime via the "unsubscribe" link found in each of the communications sent to you, or by reaching out directly via [connectfleet@free2move.com](mailto:connectfleet@free2move.com).

## Our business administration

We process personal data to ensure our services are used in a non-fraudulent and compliant way, are not used to cause any harm to individuals including our users and our staff, and that our assets (such as our cars) are held harmless, in line with our legitimate interest. If we have evidence leading us to believe you are or may be in breach of applicable laws, we may forward the required personal information to the relevant third parties and/or authorities.

## How long do we keep your data?

As long as our relationship is ongoing, we will keep your information in line with applicable laws. If you close your account, we will delete your personal information considering our legal obligations –please note these may require us to keep certain information for a specific period, for accounting, documentation, legal or reporting reasons. Generally, we may keep your information for up to 10 years after termination of the contract in line with the legal retention obligations applicable to us (e.g., under tax and commercial laws).

## Do we share your information?

We may transfer your information in line with applicable laws, by including and relying on appropriate and compliant transfer mechanisms (such as the inclusion of Standard Contractual Clauses, SCC's, where legally required), as well as on appropriate safeguards.

## Mobilisights & Kuantic

To assist us in the performance of our services,our partners “Mobilisights” (privacy policy available [here](#)) and Kuantic ([Privacy Policy](#)) may receive some of your personal and car related information (including geolocation data collected directly via our cars). Mobilisights assist us by providing the technical environment required to display our fleet management platforms, and to enable the management of a fleet. Kuantic assists us in retrieving and processing personal data (including geolocation data) collected via the hardware installed in the cars.

## Law enforcement

If you committed a legal offense or a breach of our Terms and Conditions during your rent, including parking violations, the Free2move Group may legally be required to share specific information, including

- full names, phone numbers, emails, Driving licenses vehicles & rental data and any relevant information

upon request of the local law enforcement agency, including local authorities responsible for traffic offenses, courts, local administrations, or police authorities. This is based on our legal obligations. In the event of a breach of our Terms and Conditions, we reserve the right to share the relevant information required to establish, exercise, or defend our legal rights with authorities, external consultants or authorized third parties.

## Our Group Companies/ Merger or acquisition

Free2move may transfer your personal information within our group companies and to our personnel to ensure and optimize how we perform and deliver our services to you.

If you use our services via another Free2move Group local entity or our Franchise partners, your personal data may be forwarded to register and rent with the respective local Free2move Group entity (including your registration data), in line with Art. 6 1) b) GDPR.

If we are involved in a merger, acquisition, or sale of our assets, we will notify and inform you accordingly via email and/or a notification via our website of our organizational changes. We will also provide you with assistance regarding your individual rights.

## Our Business partners and Service Providers

We have chosen to work with third parties while delivering our services. In this context, personal information may be processed, and we have chosen our partners in line with their commitment to privacy and security. This is documented by corresponding contractual safeguards and the technical and organizational safeguards implemented and assessed in line with the latest legal requirements and guidance for the authorities. Our services providers include Financial and payment collection service providers, IT

and security providers, insurance companies and brokers, Providers for maintenance and repairs of our cars, vehicle inspection and damage report providers and any business partner or supplier acting on behalf of Free2move.

### Payment & Claims management

We process and forward your payment information at the end of a drive (including your full name, email address, Customer ID, Credit card information and transactional data) to our payment service provider, which may be

- For payments: Adyen ([Privacy Policy](#)),
- For PayPal transfers: PayPal S.a.r.l et Cie, S.C.A ([Privacy Policy](#)).

In the event of outstanding claims or payment default, we rely on third parties for claims management. This is done based on our contractual obligations and in the context of fraud prevention.

### Customer service

You can submit a request to our customer service by email or telephone. We will process the personal information you provide us for the purpose of allocating, processing, and answering your request, in line with your consent and our contractual obligations. We may send surveys to assess your satisfaction with our services- in such cases, you consent to provide us with the data collected therein by entering it. You can revoke your consent anytime by contacting our customer service, or our DPO via [privacy@free2move.com](mailto:privacy@free2move.com).

We use CRM management tools: Braze ([Privacy Policy](#)) and Pipedrive ([Privacy Policy](#)).

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## Park

Free2move offers you the possibility to find and reserve an available parking spot to park your car in line with your individual needs.

## Which of your data do we process, and why?

To show you the parking spots available in the geographical area you have chosen, allow you to rent it for the period you need and for the purpose of invoicing our services, we process following information: the chosen location to find a parking spot, your user ID and payment data, the date and place of drop-off and pick-up of your vehicle, its number plate and, if park near an airport, the name of the airline you are flying with and your flight number, if relevant.

We process this information to provide our services to you, in line with our Terms and Conditions (as per. Art. 6 1. b) GDPR).

## How long do we keep your data?

As long as our relationship is ongoing, we will keep your information in line with applicable laws. If you close your account, we will delete your personal information considering our legal obligations -please note these may require us to keep certain information for a specific period, for accounting, documentation, legal or reporting reasons. Generally, we may keep your information for up to 10 years after termination of the contract in line with the legal retention obligations applicable to us (e.g., under tax and commercial laws).

## Do we share your information?

We may transfer your information in line with applicable laws, by including and relying on appropriate and compliant transfer mechanisms (such as the inclusion of Standard Contractual Clauses, SCC's, where legally required), as well as on appropriate safeguards.

## Law enforcement

If you committed a legal offence or a breach of our Terms and Conditions during your rent, including parking violations, the Free2move Group may legally be required to share specific information, including

- full names, phone numbers, emails, Driving licenses vehicles & rental data and any relevant information

upon request of the local law enforcement agency, including local authorities responsible for traffic offenses, courts, local administrations, or police authorities. This is based on our legal obligations. In the event of a breach of our Terms and Conditions, we reserve the right to share the relevant information required to establish, exercise, or defend our legal rights with authorities, external consultants or authorized third parties.

### **Our Group Companies/ Merger or acquisition**

Free2move may transfer your personal information within our group companies and to our personnel to ensure and optimize how we perform and deliver our services to you.

If you use our services via another Free2move Group local entity or our Franchise partners, your personal data may be forwarded to register and rent with the respective local Free2move Group entity (including your registration data), in line with Art. 6 1) b) GDPR.

If we are involved in a merger, acquisition, or sale of our assets, we will notify and inform you accordingly via email and/or a notification via our website of our organizational changes. We will also provide you with assistance regarding your individual rights.

### **Our Business partners and Service Providers**

We have chosen to work with third parties while delivering our services. In this context, personal information may be processed, and we have chosen our partners in line with their commitment to privacy and security. This is documented by corresponding contractual safeguards and the technical and organizational safeguards implemented and assessed in line with the latest legal requirements and guidance for the authorities. Our services providers include Financial and payment collection service providers, IT and security providers, insurance companies and brokers, Providers for maintenance and repairs of our cars, vehicle inspection and damage report providers and any business partner or supplier acting on behalf of Free2move.

### **Payment & Claims management**



We process and forward your payment information at the end of a drive (including your full name, email address, Customer ID, Credit card information and transactional data) to our payment service provider, which may be

- For payments: Adyen ([Privacy Policy](#)),
- For PayPal transfers: PayPal S.a.r.l et Cie, S.C.A ([Privacy Policy](#)).

In the event of outstanding claims or payment default, we rely on third parties for claims management. This is done based on our contractual obligations and in the context of fraud prevention.

### Customer service

You can submit a request to our customer service by email or telephone. We will process the personal information you provide us for the purpose of allocating, processing, and answering your request, in line with your consent and our contractual obligations. We may send surveys to assess your satisfaction with our services- in such cases, you consent to provide us with the data collected therein by entering it. You can revoke your consent anytime by contacting our customer service, or our DPO via [privacy@free2move.com](mailto:privacy@free2move.com).

We use CRM management tools: Braze ([Privacy Policy](#)) and Pipedrive ([Privacy Policy](#)).

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## Your application for a F2m position

We may post offers about our open position and job vacancies via a multitude of channels, including posts on social medias (via LinkedIn or online recruitment platforms for example). The following privacy policy applies if you have responded to one of these offers or have entered a recruitment process within the Free2move Group via other means.

### Which of your data do we process, and why?

To consider if a profile could be a fitted candidate to one of our open positions, we may process information about your identity, your contact

details, your qualifications, relevant skills and employment history, and information about your expected remuneration. This information is made available by you via the means of your choice (via online-applications, CV's, cover and reference letters) or is collected during the recruitment process (via interviews and/or tests). This information is processed based on your consent.

Additionally, we may forward your personal information to the relevant law enforcement agencies if we have evidence that you may have committed an infraction to applicable law.

### **How long do we keep your data?**

We may keep your application for up to 6 months after its submission. After 6 months, we may either delete your application, or continue to store your application for another 6 months, if you have given us your consent.

### **Do we share your information?**

We may transfer your information in line with applicable laws, by including and relying on appropriate and compliant transfer mechanisms (such as the inclusion of Standard Contractual Clauses, SCC's, where legally required), as well as on appropriate safeguards.

### **Our Group Companies/ Merger or acquisition**

Free2move may transfer your personal information within our group companies and to our personnel. This is done in line with our legitimate interest to assess an applicant's suitability for our position and for pre-contractual stages of our employment contract. If we are involved in a merger, acquisition, or sale of our assets, we will notify and inform you accordingly via email and/or a notification via our website of our organizational changes. We will also provide you with assistance regarding your individual rights.

### **Law enforcement**

If you committed a legal offense, Free2move may be required to share specific information related to this offense upon request of the local law

enforcement agency. These can include the local authorities for local administrations, or police authorities. Please note that in such cases, we are legally required to comply with such requests and we reserve the right to share the relevant information required to establish, exercise, or defend our legal rights with authorities, external consultants or authorized third parties.

### **Our Business partners and Service Providers**

We have chosen to work with some third parties while delivering our services to you and in this context, some of your personal information may be processed. Where this is the case, we have chosen partners in line with their commitment to privacy and security, documented by the corresponding contractual safeguards, the technical and organizational safeguards implemented. Please note that these safeguards are always assessed in line with the latest legal requirements and guidance for the authorities. These service providers include Financial and payment collection service providers, IT and security providers and any business partner or supplier acting on behalf of Free2move.

### **Teamtaylor and Greenhouse**

We have chosen to work with our service providers Teamtaylor and Greenhouse to help us manage our recruitment process across the Free2move Group. You can find more information on the processing of personal data by our partners via their respective privacy policy here ([Teamtaylor](#)) and here([Greenhouse](#)).

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## **You are a website visitor**

As the Free2move Group, we offer and advertise our services online via our websites- the following section applies for the processing of personal information related to the provision of our website and its functionalities.

### **Which of your data do we process, and why?**

## Register as a User

You can apply to register for a user account via our Website. Where this is the case, we will collect and process the following personal information: your full name, place and date of birth, your address, Phone number, language, password and, where relevant, promotional codes. We process this information to review your request and your eligibility to access our services, in line with both our legal and contractual obligations.

## Reserving a car

As a registered user of our services, you can use our website to reserve one of our vehicles and require its delivery to a location of your choice. To perform this service, we may process (in addition to the information related to your user account) the delivery address, date and time as well as the vehicle category selected. We process this information to perform our services, in line with our contractual obligations.

## Adding a Driver

If you wish to add a driver while you reserve a vehicle via our website, we will create a link for you/the primary driver to be shared with the additional driver. This link directs to a login area (disclosing which primary driver sent the invitation) to enable to log in or register as a user of our services. Once logged in, they are asked to accept or decline the invitation- this choice is shared with the main driver, as well as the starting and end location, the duration of the trip and information related to the vehicle, if relevant. We process this information to provide our services, in line with our contractual obligations.

## Getting in touch with you

We offer several possibilities to get in touch with us via contact forms embedded on our websites (via our contact form, or via our B2B services). Note that we will process the information you may enter there to process your request, to get in touch with you and to provide you with an answer to your query. This information may include your full name, your contact details as well as your message to us and may be forwarded to our CRM, provided by our partner Braze ([Privacy Policy](#)) and Pipedrive ([Privacy](#)

[Policy](#)). Please read their respective Privacy Policies for more information on their processing of personal data.

### Provision of our Websites: Cookies and similar technologies

While you access our websites, we may collect and log some of your personal and browser information (which may include your IP address and Browser), logs of your interactions with our content, including any potential issues encountered. We process this information temporarily to ensure the continuity and security of our services, and delete it shortly after.

We are using cookies and similar technologies on our website. Please note that you can opt-out from non-necessary cookies via the browser settings available to you (e.g., by cleaning your browser cache) but this may affect your experience within our platforms. For more information on cookies and the related processing of your personal information, as well as the choices available to you, please read our information notices in our Cookie Banner and/or our [Cookie Management Policy](#).

We have also included Social Media Buttons on our site. These can be used to promote our websites via social networks like Facebook. For more information on the processing of your personal information via these networks, please read their respective privacy policies.

We are using Google Analytics for website statistics. For more information, please read Google's [Privacy Policy](#).

### How long do we keep your data?

Where we store your personal information based on your consent, you can revoke your consent anytime (by cleaning your cookies via your browser settings for example or requesting the deletion of your contact information previously entered by reaching out via [privacy@free2move.com](mailto:privacy@free2move.com)). As a rule of thumb, we recollect consent via our cookie banner every 6 months.

Where we process your information based on our legitimate interest, it is deleted in line with applicable laws and our retention policy.

### Do we share your information?

## **Our Free2move Group business partners**

Where we offer the opportunity to benefit from discounts and promotional offers of our partners, we may notify you via e-mails, notifications via our App, Website or cars, or by post. Please note that we do not share your information with our partners for this purpose.

## **Our Service Providers**

We have chosen to work with some third parties while delivering our services to you and in this context, some of your personal information may be processed. Where this is the case, we have chosen partners in line with their commitment to privacy and security, documented by the corresponding contractual safeguards, the technical and organizational safeguards implemented. Please note that these safeguards are always assessed in line with the latest legal requirements and guidance for the authorities. These service providers include IT and security providers, CRM management tools (such as Braze and Pipedrive) and any business partner or supplier acting on behalf of Free2move.

## **Law enforcement**

If you committed a legal offense or a breach of our Terms and Conditions during your rent, Free2move may be required to share specific information related to this offense upon request of the local law enforcement agency. These can include the local authorities responsible for traffic offenses, local administrations, or police authorities. Please note that in such cases, we are legally required to comply with such requests. In the event of a breach of our Terms and Conditions, we reserve the right to share the relevant information required to establish, exercise, or defend our legal rights.

## **Our Group Companies/ Merger or acquisition**

Free2move may transfer your personal information within our group companies and to our personnel to ensure and optimize how we perform and deliver our services to you.

If you use our services via another Free2move Group local entity or our Franchise partners, your personal data may be forwarded to register and

rent with the respective local Free2move Group entity (including your registration data), in line with Art. 6 1) b) GDPR.

If we are involved in a merger, acquisition, or sale of our assets, we will notify and inform you accordingly via email and/or a notification via our website of our organizational changes. We will also provide you with assistance regarding your individual rights.

## Managing your satisfaction, Promotional Offers and Newsletter

To improve how we deliver our products and services to you, we collect and combine:

- information related to your use of our products;
- information present in your user profile and related to your rental history and/or your use of our mobility services.

This is done to tailor our offers to your individual needs. To provide you an overview of our offers and promotions, we may notify you via different means including via advertising within our Apps, or via our Newsletters. We may send these out via our CRM service providers Braze ([Privacy Policy](#)) and Pipedrive ([Privacy Policy](#)).

We base these activities both on our legitimate interest and your consent, where relevant.

You can revoke it anytime via your user settings, by unsubscribing from our communications via our “unsubscribe” link or by reaching out to our DPO via [privacy@free2move.com](mailto:privacy@free2move.com).

## Fraud prevention

As a business, our customers and our cars are our main priorities. If either one is in danger, we reserve the right to collect, process and retain certain information in line with our contractual and legal obligations, as well as in our and our user’s legitimate interest.

Such danger can occur in the event of fraud, theft or damages to cars, misuse of cars resulting in a breach of our Terms and Conditions and/or local laws, exceeding the maximum rental period, suspension of payments, outstanding invoices, leaving the scene of an accident, (attempted) fraud related to identity or refueling, parking, attempt to breach our IT Security protocols and infrastructure, and more.

Please note that in such cases, we reserve the right to document the relevant circumstances, share information with the relevant third parties (including law enforcement) and implement corrective measures which can lead to the definitive closure of your account. We also conduct appropriate verifications during your registration (with sanctions lists) in line with legal requirements.

### **Fraud prevention during registration**

In line with our legitimate interest and legal rights to prevent the creation of fraudulent accounts on our platforms and potential financial harms caused by unpaid invoices, we perform a risk assessment. These checks may be conducted upon your initial registration, or each time you register a new payment method, and following information may be processed by automated means:

- your full name and your email address.

Where relevant, flagged results will be submitted for a manual check by our specialized department.

## **Do we share your information outside of the EEA?**

Please note that while we deliver our services internationally, our servers (AWS) and your data are in Germany (Frankfurt).

We have chosen to work with some third parties while delivering our services to you and in this context, some of your personal information may



be processed. We have chosen partners in line with their commitment to privacy and security, documented by the corresponding contractual safeguards (such as Standard Contractual Clauses, SCC's), the technical and organizational safeguards implemented. Please note that these safeguards are always assessed in line with the latest legal requirements.

## How do we safeguard your data?

We are committed to protecting and enforcing the confidentiality of your personal information. To prevent manipulation, loss, or misuse of your data, we have implemented extensive technical and organizational measures which we regularly review and adapt to technical progress. These may include the use of recognized encryption procedures (SSL or TLS) while we process or transfer data.

However, please note that due to the nature of the internet, you may interact with third parties who do not observe any security or privacy requirements. They may lead you to be subject to (potential) fraud attempts which may involve your personal information outside of our technical environments - in such cases, please note that these may take place outside of our area of control.

## Your individual rights

If you are a natural person and if we process your personal information, you can submit a request in line with your individual rights. Under applicable Data Protection Laws, you may:

- Request access to your personal information ("Right of Access", Article 15 GDPR),
- Ask for the rectification of your data if it's outdated or inaccurate (Article 16 GDPR)
- Submit a request for the deletion of your personal data ("Right to be forgotten", Article 17 GDPR)
- Restrict the processing of personal data (Article 18 GDPR);
- Object to the processing of your personal data (Article 21 GDPR);

- Request the portability of the data you have provided us (Article 20 GDPR);
- Withdraw your consent in line with applicable laws (Article 7 (3) GDPR);
- Lodge a complaint with your local supervisory authority for the protection of personal data (Article 77 GDPR).

We will not subject you to any automated decision-making, including profiling, which would result in a negative consequence for you in any way.

Your rights are not absolute and may be subject to some restrictions. You may exercise these by e-mail via [privacy@free2move.com](mailto:privacy@free2move.com), or via your user setting available in our application.

### Registration cancellation / Account deletion

You can request the deletion of your registration/ user account anytime. You can do so via the settings of your user account, or by contacting our customer support, but in some cases, an early termination may not be possible (e.g., if the rent is still ongoing, for example).

Please note that such a request will lead to the deletion of your personal information, however, we may be required to keep some information in line with our legal retention obligations.

### Changes to this Privacy Policy

We may make changes to this Privacy Policy from time to time to comply with legal requirements.