

About our privacy policy

To enable you to share a car via MyWheels, we need personal data from you. This privacy policy describes which data we process, for what purposes these data are used, and with whom we share these data. We also explain how we store the data and what rights you have with regard to the personal data provided to us. This privacy policy applies to the use of the services of MyWheels, including a visit to our website or the use of the MyWheels App. By using the MyWheels services you agree to our privacy policy. The commencement date of this privacy policy is 15 June 2023; on publication of a new version, all previous versions cease to apply.

1. What are personal data?

Personal data are data that say something about you or that we can link to you. Think of, for example, your name, address and telephone number, but also the IP address of your computer. You share personal data with MyWheels when you use our services.

2. What personal data do we process?

On registration, we ask you to provide personal data. Because we feel that your privacy is important, we only ask for the personal data that we need to enable you to share a car. Without these data, using MyWheels is unfortunately not possible.

Before you can rent a car, we process the following personal data:

- Name
- Address
- Date of birth
- Email address
- Telephone number
- IP address
- The device used to log in
- IBAN number and name of the bank account holder
- Behavior on the platform such as the pages visited, duration of your visit and search filters used.

When you log in to MyWheels via Facebook, Apple or Google, we process the following personal data:

- Your Facebook unique identifier (UID) and your name on Facebook
- Your Apple or Google unique identifier (UID)

Optionally, you can enrich your MyWheels profile with the following data:

- Profile photo
- Company name

When you rent cars, we will also process the following personal data:

- Driving license details such as your driving license number, issuing country, place of birth and expiry date
- Your notes in connection with reservations

Data regarding the car:

MyWheels also processes data regarding the car:

- Every car contains technology that detects hard braking, speeding (driving over the speed limit), and driving fast or sharply round bends.
- Trip details, including the start time and end time of reservations, but also times when the car is entered or exited, the motor is started or stopped, and the location of the car.
- In addition, we keep other records regarding the car, such as damage to the car or a dirty car.

We may link these data regarding the car to your account. If you have designated several persons as a hirer and/or a driver within your account, we cannot trace the data collected by us to those individual persons. If you can, these data may be regarded as personal data within the meaning of the General Data Protection Regulation (“GDPR” or privacy law). It is your responsibility to handle these data with due care. .

3. For what purposes do we use personal data?

MyWheels uses personal data first of all to offer its services through the platform, and therefore for the following purposes:

- Creating an account
- Giving you access to the platform
- Making a reservation
- Collecting a payment
- Analyzing and improving our services
- Keeping the platform safe and safeguarding the quality of our services:
 - preventing nonpayment, fraud and embezzlement
 - settling claims, transferring fines and abuse of our cars
- Contacting you
- Performing marketing activities

MyWheels uses an algorithm that combines the data regarding the car with your account details and analyzes them. Based on that analysis, a designated MyWheels employee may decide to block your account (temporarily).

On request, the account holder may be given access to these data. MyWheels will only provide the data for the purpose of providing the account holder with insight into the factors that have contributed to that decision. It is the responsibility of the account holder to handle these data in a proper and lawful manner.

4. With whom do we share your personal data?

We will never sell your data to third parties for commercial purposes. However, MyWheels is assisted by several other service providers. We make sound arrangements with these service providers and record this in processing agreements. We share your personal data with the following parties:

- MessageBird: a Dutch-based enterprise for sending text messages. All text messages that you receive from MyWheels with regard to reservations are sent through the MessageBird servers.

- Pay.nl: a Dutch-based enterprise that processes iDEAL payments, payments made by us, and direct debits.
- CrimiMail: a Dutch-based enterprise that provides information about persons using which MyWheels can make a risk assessment for nonpayment, fraud and embezzlement.
- Interswitch: when you contact the support department of MyWheels outside office hours, Interswitch will answer the call. Interswitch is a Dutch-based enterprise for outsourcing customer service.
- Onfido: identification and verification platform assisting in the validation of your identity.
- Leanplum: marketing and engagement platform through which we send personalized push notifications and collect and analyze user data.
- Hubspot: marketing and sales platform assisting in customer relationships management, website activity tracking and automation of marketing campaigns.
- TSG Operations: this is a company that, just like us, is part of The Sharing Group and that supports us in drawing up reports, statistics and analyses for our management;
- Marketing software: we use the software tools of MailChimp, LinkedIn, Google and Facebook for marketing purposes.
- Competent authorities: MyWheels discloses personal data to competent authorities if there is a legal obligation to do so or if this is strictly necessary for the prevention, investigation and prosecution of criminal offenses and fraud.
- Coeco: a collection agency with which we share personal data of the account holder in the case of unpaid invoices.

All MyWheels employees who have access to your personal data have signed a non-disclosure agreement (NDA).

5. How do we protect your personal data?

Your personal data are stored on secure servers within Europe. Our servers are not shared with third parties. MyWheels uses technical and organizational security measures to protect your personal data against loss and unauthorized access.

6. How can you access, adjust or remove your personal data?

Do you want to know what personal data we have recorded of you? Then you can use your 'Right of access'. Send a request for access to support@mywheels.nl and you will receive a response within four weeks of receipt of your request.

When you log in to MyWheels, you can see a lot of personal data and you can also adjust your personal data there. If this does not work, please contact us via support@mywheels.nl and you will receive a response within four weeks of receipt of your request.

You can simply remove your account yourself through our website or the MyWheels app. If for whatever reason you are unable to do so, you can submit a request for removal of your personal data through the website or the MyWheels app quoting "request for removal". You will receive a response within four weeks of receipt of your request. We will remove your

personal data unless there are urgent reasons for not doing so. Urgent reasons are, for example, outstanding invoices or because we have a legal obligation to retain your data.

If we are unable to establish (fully) to which personal data a request for access, adjustment or removal relates and/or if you are the data subject, we will ask you to specify your request in more detail or to provide further identification. We will then suspend the implementation of your request until you have specified your request in more detail or have been able to demonstrate that you are the data subject.

7. How long do we retain your personal data?

We will retain your personal data for as long as your account is active at MyWheels. After you have removed your account, we will not retain your personal data any longer than necessary. If we want to retain certain data longer than strictly necessary, we will make sure that we can no longer trace these data back to you. For example, because we will be processing data on an aggregated level or anonymize data.

Do you want to start using MyWheels again at some point, and has your old account not been blocked by MyWheels? Then you can create a new account.

Questions and feedback

We regularly check our compliance with this privacy policy. If you have any questions about this privacy policy, you can contact us:

James Wattstraat 77-K

1097 DL

Amsterdam

085-7734222

support@mywheels.nl

Please state “privacy policy” in your request.

If you have a complaint about the way in which MyWheels handles your personal data and we cannot work it out together, you can also submit a complaint to the Dutch supervisory authority, the [Dutch Data Protection Authority](#).