Privacy policy

About our privacy policy

To be able to share cars via MyWheels, we need you to provide us with personal data. This privacy policy describes what data we process, what purposes this data is used for, and the parties with whom we share the data. We also explain how we store the data and what your rights are in relation to the personal data made available to us. This privacy policy applies to the use of the services provided by MyWheels. By using the services of MyWheels, you consent to our privacy policy. These terms and conditions entered into force on May 15, 2023; the publication of a new version ends the validity of all previous versions.

1. What are personal data?

Personal data are data that contain information about you or that we could use to connect to you. Examples include your name, address, and telephone number, but also the IP address of your computer. You share personal data with MyWheels if you use our services.

2. What personal data do we process?

When you sign up, we ask you to provide us with personal data. Because we value your privacy, we only ask for the personal data that we need in order to make carsharing possible. Unfortunately, it is not possible to use MyWheels if we do not have this data. Before you can hire a car, we process the following personal data:

- Name
- Address
- Gender
- Date of birth
- Email address
- o Telephone number
- IP address
- o IBAN number and name of your account
- Behaviour on the platform, such as the pages you visit, duration of your visits, and the search filters used.

If you sign up to MyWheels via Facebook, we process the following personal data:

- Link to your Facebook profile
- Your name on Facebook

You have the option of enhancing your MyWheels profile with the following information:

- Links to your Twitter and LinkedIn profiles
- o Profile photo
- Company name

If you hire cars, we also process the following personal data:

- o Driving licence number and expiry date
- Start and end times of your reservations
- Moment you get in and out of the car
- Notes with reservations

MyWheels also processes data related to the car. We can link this data to your account:

- Every car contains technology that signals hard braking, speeding (exceeding the speed limit), accidents and hard or sharp speeding through corners.
- Data related to the booking. Including the start and end time of reservations, as well as times when you get in and out, the car is started or stopped, and the locations of the car.
- o In addition, MyWheels keeps track of other data related to the car, such as damage to the car, a dirty car, (fines for) traffic violations and (fines for) incorrect parking.

3. What do we use your personal data for?

MyWheels processes personal data to provide its services via the platform, for the following purposes, for example:

- Creating an account
- o To grant you access to the platform
- Making a reservation
- Collecting a payment
- Analysing and improving our services
- Keeping the platform secure, such as to prevent non-payment, fraud, and embezzlement
- Contacting you
- Carrying out marketing activities

MyWheels uses an algorithm that combines and analyzes the data related to the car with your account data. Based on that analysis, MyWheels may decide to (temporarily) block your account. At his request, the account holder can inspect the data on which that decision is based. MyWheels provides the data solely for the purpose of enabling the account holder to verify whether MyWheels data is correct. It is the responsibility of the account holder to handle the data that we provide to you as an account holder in a correct and lawful manner.

4. With whom do we share your personal data?

We will never make your details available to third parties for commercial purposes. However, MyWheels is helped by a number of other service providers. We make clear agreements with these service providers and set them down in processing agreements. We share your personal data with the following parties:

- MessageBird: a company based in the Netherlands for sending text messages. All text messages relating to reservations that you receive from MyWheels are sent via the MessageBird servers.
- <u>Pay.nl</u>: a company based in the Netherlands that processes iDEAL payments, reimbursements, and direct debits.
- CrimiMail: a company based in the Netherlands that provides personal information that enables MyWheels to make a risk assessment for non-payment, fraud, and embezzlement.
- Micpoint: a company based in the Netherlands that provides cars with connectivity so that their location can be communicated and opened and locked with a smartphone and/or OV chip card.
- Invers: a company based in Germany that provides cars with connectivity so that their location can be communicated and opened and locked with a smartphone and/or OV chip card.
- Interswitch: if you telephone the MyWheels support department outside office hours, it is Interswitch who answers. Interswitch is a company based in the Netherlands for outsourcing customer services.
- Nationaal Incasso Bureau: if you do not pay an outstanding invoice on time and do not respond to payment reminders, we transfer your personal data to the Nationaal Incasso Bureau, a company based in the Netherlands with an AFM licence.
- Marketing software: for marketing purposes, we use MailChimp, Google, and Facebook software tools.
- Competent authorities: MyWheels makes personal data known to competent authorities if legally required to do so or if it is strictly necessary for the prevention, detection, or prosecution of criminal acts and fraud.

Every MyWheels employee who has access to your personal data has signed a confidentiality declaration.

5. How do we keep your personal data secure?

Your personal data are stored in the Netherlands on secure servers of Site4U; our servers are not shared with other websites. MyWheels uses technical and organisational security measures in order to protect your personal data against loss and unauthorised access.

6. How can you view, modify, or delete your personal data?

Would you like to know what personal data about you we have registered? If so, you may use your 'Right of access'. Send an access request to support@mywheels.nl. You will receive a response within four weeks of receipt of your request.

You see much of your personal data when you log into MyWheels - you can also modify your personal data there. Any personal data that you are unable to modify yourself can be altered by our support employees. Contact them on support@mywheels.nl. You will receive a response within four weeks of receipt of your request.

Send your request for deletion of your personal data to support@mywheels.nl. You will receive a response within four weeks of receipt of your request. We will delete your personal data if there are no compelling reasons not to do so. Compelling reasons could include outstanding invoices or being on an exclusion list.

If we cannot, either wholly or in part, establish to which personal data a request to view, modify, or delete relates, we will ask you to further clarify your request. We will not continue to proceed with your request until you have given such additional clarification.

7. How long do we keep your personal data?

If you do not submit any request to delete your personal data, your account with MyWheels will remain active. If you do not log onto MyWheels for seven years, we will automatically delete your personal data. Would you like to use MyWheels after your data has been deleted? In that case, you can create a new account.

Questions and feedback

We regularly check whether our privacy policy is fit for purpose. If you have any questions about this privacy policy, please get in touch:

James Wattstraat 77-K 1097 DL Amsterdam 085-7734222 support@mywheels.nl

Complaints about the MyWheels privacy policy may be submitted to the Dutch regulator Dutch Data Protection Authority.