

# CITYBEE PRIVACY POLICY

**CityBee Eesti OÜ** (hereinafter - **we or the Company**) values and protects the privacy and security of personal data, therefore in this Privacy Policy (hereinafter - **the Privacy Policy**), we explain how we handle the data of our customers (hereinafter - **the Client**) and other data subjects (hereinafter collectively referred to - **You**) personal data when you use (a) CityBee mobile application (hereinafter - **Mobile application or Mobile App**), (b) CityBee vehicles - cars, bicycles (hereinafter - **Vehicles**), (c) CityBee website <https://www.citybee.ee> (hereinafter - **the Website**) and (d) when you communicate with us by phone, e-mail, social networks, and/or in other ways.

When processing personal data, we comply with the 2016 April 27 Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons in the processing of personal data and on the free movement of such data, which repeals Directive 95/46/EC (General Data Protection Regulation, hereinafter - **GDPR**), other applicable legal acts regulating personal data protection, and the provisions of this Privacy Policy.

In this Privacy Policy, we present the most important structured information about the protection of your personal data: i.e., what personal data we collect, how and why we use it, on what legal basis we process it, how long we store it, to whom we transfer it, as well as our duties in processing your personal data, your rights and the methods of their implementation. **The most important information about processing your personal data is presented in the tables in Chapter 15 of this Privacy Policy.** Please take the time to review this Privacy Policy, and please do not hesitate to contact us if you have any questions.

If you use the Mobile Application and/or the Website, we will assume that you are familiar with this Privacy Policy and the purposes, methods, and procedures for processing your personal data specified in it. If you do not want your data to be processed as described in this Privacy Policy, please do not use the Mobile Application and/or Website, and do not provide us with your personal data in any other way.

The Privacy Policy is a constantly changing document, so we can improve, change, and update it if necessary. For this reason, please visit the Website or Mobile Application from time to time, where you will always find the latest version of the Privacy Policy. We will also additionally inform you about the most significant changes to the Privacy Policy, and we will always publish the updated version on our Website and Mobile App.

**The latest changes to the Privacy Policy have been made and are valid from the 20th of July 2023.**

## 1. DEFINITIONS

The following terms are defined as follows in this Privacy Policy:

**We, or the Company**, shall mean CityBee Eesti OÜ, a private limited liability company, established and operating under the laws of the Republic of Estonia, legal entity code 14646800, address of registered office: Harju maakond, Tallinn, Kesklinna linnaosa, Narva mnt 31, 10120;

**Services** shall mean all services that the Company offers and provides to you, including (i) services of lease (use), maintenance of the Vehicle and assets therein, third-party liability insurance, also providing materials and fuel necessary for the use of the Vehicle and other assets for their normal purpose, (ii) services provided via the App and the Website.

**The Website** shall mean the website accessible at <https://www.citybee.ee>.

**Self-service** shall mean online self-service, accessible at <https://selfservice.citybee.ee/>.

**Mobile Application or App** shall mean CityBee software for smartphones, tablets and/or other mobile devices, which is used to perform Vehicle reservation, unlocking, locking and/or other actions provided for therein.

**Account** means a digital account of a natural or legal person, for personal use, created in the Mobile Application.

**Premium class vehicles** – high-value luxury and/or exclusive cars (such as Porsche brands).

**Terms and Conditions** or **Terms** shall mean the Company's Terms on Rental and Service Provision available on the App as well as Website.

**Services Agreement** shall mean the agreement on provision of the Services concluded between you and the Company in accordance with the Terms and Conditions.

**EEA** means the European Economic Area, which consists of the European Union states and Liechtenstein, Iceland, and Norway.

Other terms shall have the meanings assigned to them and defined in the GDPR and the Services Agreement.

## 2. ON WHAT LEGAL BASIS DO WE PROCESS YOUR PERSONAL DATA?

We process your personal data specified in this Privacy Policy based on the following legal bases:

- when concluding, executing, changing, and administering the Service Agreement (GDPR Art. 6(1)(b));
- fulfilling the legal obligations and requirements of legal acts applicable to us (GDPR Art. 6(1)(c));
- implementing our and third parties' legitimate interests (GDPR Art. 6(1)(f));
- implementing your consent (GDPR Art. 6(1)(a), GDPR Art. 9(2)(a));

In the scope and conditions provided by the applicable legal acts, one or more of the above-mentioned legal bases may be applied to the processing of your same personal data. **The purposes and legal bases for the processing of your personal data are described in detail and presented in Chapter 15 of this Privacy Policy.**

## 3. FOR WHAT PURPOSES AND WHAT PERSONAL DATA DO WE COLLECT?

We collect and process only your personal data that are sufficient and necessary to achieve the purposes for which they are processed. **The purposes for processing your personal data and the list of collected personal data are described in detail and presented in Chapter 15 of this Privacy Policy.**

We may combine the personal data we have received from you ( when you are using the Mobile Application, the Services, and/or the Website) with the personal data we have collected from other public or accessible sources (e.g., with data obtained using website cookies, or with data legally obtained from third parties and etc.).

## 4. CAN YOU NOT PROVIDE YOUR PERSONAL DATA AND/OR NOT CONSENT TO THE PROCESSING OF YOUR PERSONAL DATA?

Your personal data is collected and processed to conclude or fulfill the Service Agreement with you and/or enable us to promptly and adequately provide the Services and respond to your requests and complaints. Suppose you do not provide your data, provide it with errors, or refuse to provide it further. In that case, we will not be able to conclude and/or execute the Service Agreement, provide the Services and adequately respond to your requests, complaints, and/or other requirements that require our action. Accordingly, failure to provide personal data or refusal to continue to provide certain personal data will mean that the Service Agreement with you will not be concluded or will be terminated.

Chapter 11 of the Privacy Policy outlines more information about your rights.

## 5. FROM WHAT SOURCES DO WE GET YOUR DATA?

We receive almost all your personal data from you; when you enter into a Service Agreement with us, use the Mobile App, the Services, the Website, and receive your personal data in other informed ways.

Also, when it is allowed by legal acts, and when it is necessary for the execution of the Service Agreement and/or to achieve other purposes of processing your personal data, the Company collects or becomes known to the Company various information about you from the following multiple sources:

- from official institutions - data on the validity of the driver's license;
- from the police and municipalities - information about road violations of Road Traffic Regulations and other violations and incidents;
- from insurance companies and other official institutions or persons - information about traffic incidents, damage to the Company's Vehicles or third parties;
- from payment service providers – information about your payment transactions;

- from debt collection companies, claims management and/or credit rating companies - data of your financial obligations to us;
- from public registers – various publicly available information;
- from internet/communication service providers – Your usage data;
- from other official institutions (e.g., various police units, State Data Protection Inspectorate, Estonia Tax and Custom Board etc.) - information on ongoing investigations.

## 6. DO WE SHARE YOUR PERSONAL DATA WITH OTHERS?

Yes, the Company discloses all or part of your personal data to the following data recipients: various service providers, companies belonging to the same group as the Company, competent authorities, and other data controllers who have the right to information under applicable laws and/or our legitimate interests. Also, upon receipt of your consent, your personal data may be disclosed to persons and/or companies indicated by you.

More information:

- 6.1. The Company uses various service providers (e.g., server and cloud rental, IT service, identity verification, payment collection, audit, accounting, legal, tax consulting services, claims administration, debt collection, analytics, direct marketing, customer service, and other service providers). All service providers have concluded service and data processing contracts with us and are considered processors of your personal data, who can process your personal data only following our instructions and in strict compliance with the purposes of the processing. All data processors, like us, must ensure the security of your personal data under the applicable laws.
- 6.2. To ensure the smooth provision and quality of the Services, it may be necessary to transfer some of your personal data to other companies belonging to the same group as the Company. Intergroup companies, like other service providers, are considered data processors and are subject to all the terms and conditions applicable to data processors.
- 6.3. If necessary and on legally justified grounds, we also provide your personal data to service providers who are separate data controllers, as well as to various institutions, organizations, and other data controllers who have the right to receive information under applicable legislation and/or our legitimate interests. For example:
  - in the event of an accident and/or car accident, your data will be transferred to insurance companies and, if necessary, to other parties involved in the accident;
  - after receiving fines for traffic violations, we have the right and, in certain cases, the obligation to disclose the data of the person who violated the traffic rules to the relevant authorities (e.g. the police), based on the Vehicle data we have;
  - we have the right and, in certain cases, the obligation to transfer information about you to competent authorities (e.g. law enforcement authorities, courts, other dispute resolution authorities) for the purposes of investigating fraud, crime and crime prevention and other investigations;
  - after receiving fines for parking (parking) violations, we have the right and, in certain cases, the obligation to transfer your data to parking lot owners or designated collection companies that contact us on their behalf;
  - if you do not fulfill your financial obligations according to the Service Agreement and do not pay the debt within the deadline specified in the notice, we have the right to transfer your personal data to debt collection companies, bailiffs, and courts in order to start debt collection processes;
  - Your personal data may also be transferred to other data controllers (insurance companies, vehicle maintenance service providers, or other additional service providers);
  - Your personal data may also be transferred to other service providers who are independent data controllers whose offers, promotions, and game campaigns you have agreed to receive;
  - Your personal data may also be transferred to operators of social network platforms if you perform active actions on our social media profiles (e.g. Facebook, LinkedIn).

## 7. DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA?

Data processors and independent data controllers with whom we share your personal data are usually located in European Union member states or store data entrusted to us in European Union countries. However, we have cases where carefully selected service providers (e.g., Google, Microsoft Azure, App Flyer, CleverTap,

etc.) and controllers (e.g., operators of social networking platforms LinkedIn, Facebook, etc.) process personal data outside the EEA.

In such cases, we carefully follow the practices and guidelines of supervisory authorities regarding the transfer of personal data outside the EEA and carefully assess the conditions under which the data is transferred and may continue to be processed and stored after the transfer outside the EEA. Also, to ensure an adequate level of data security and to guarantee the lawful transfer of data, where possible, we sign the standard contractual terms approved by the European Commission (Article 46(2)(c) GDPR) for data transfers outside the EEA or ensure that this is done otherwise, in accordance GDPR norms.

If you would like to receive more information about how we ensure the security of your personal data when transferring it outside the EEA, don't hesitate to contact us using the contact details provided in Chapter 14 of the Privacy Policy.

## **8. DO WE PERFORM AUTOMATED DECISION-MAKING AND/OR PROFILING?**

The Company uses automated decision-making, including profiling, to fulfill the terms of the Agreement (e.g. allocation of ON benefits, etc.) and to provide customized direct marketing services (e.g. sending newsletters only to interested customers). Accordingly, the Company may collect, analyze and process personal data by applying special algorithms and prediction models about your choices, behavior, criteria for using the Services, amounts spent, and similar characteristics. All these performed actions do not have any legal or similarly significant effect on you.

## **9. HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

We process and store your personal data for no longer than the purpose(s) of processing required or when required by law. Detailed information about the possible purposes of processing your personal data and the retention periods of personal data processed for these purposes is specified in Chapter 15 of this Privacy Policy.

At the end of the set term for processing and storing your data, we delete your data or reliably and irreversibly depersonalize them as soon as possible, within a reasonable period of time necessary to perform such an action.

**Your personal data may be stored longer than specified in this Privacy Policy only when:**

- Your data is necessary for the proper administration of debt, damage (e.g., you failed to fulfill your financial and/or property obligations or caused damage to the Company or other persons) for the investigation of a dispute, complaint, to ensure our or third parties' legal interests;
- it is necessary for the Company to be able to defend itself against existing or threatened demands, claims, or lawsuits in order to exercise its rights;
- there are reasonable suspicions of violations, illegal acts, for which there is or may be an investigation;
- the data is necessary to ensure the security, integrity, and resilience of information systems (e.g., after noticing suspicious actions in the Account, Mobile App, Website, etc.);
- there are other grounds provided for in legal acts.

## **10. HOW DO WE ENSURE THE SECURITY OF YOUR PERSONAL DATA?**

We process your personal data responsibly and securely, following our internal data processing rules and appropriate technical and organizational measures to protect personal data against unauthorized data processing, accidental loss, destruction, damage, alteration, disclosure, or any other illegal processing action. Accordingly, we follow the following essential data processing principles:

- we collect personal data only for defined and legal purposes;
- we process personal data honestly and only for the primary purpose;
- we store personal data for no longer than the established purposes or legal acts require;
- we entrust the processing of personal data only to employees who have been granted the such right and official access;
- we process personal data only by applying appropriate technical and organizational measures;
- we disclose personal data to third parties only if there is a legal basis;
- if applicable, we inform the State Data Protection Inspectorate about recorded or suspected violations of personal data security;

- we periodically conduct data protection training for our employees;
- we perform periodic internal and/or external IT security audits;
- we change, adapt, and constantly improve various processes to ensure the safest possible personal data collection, reception, transmission, use, etc. processing steps.

We emphasize that we regularly monitor our systems for possible violations or attacks. Still, it is impossible to ensure the complete security of information transmitted over the internet or to prevent breaches, especially those that may occur due to your carelessness or disclosure of data to others. Taking this into account, we note that you also bear the personal risk of submitting personal data using the internet connection through the Mobile Application and the Website. You also maintain the entire risk related to the voluntary disclosure of your Account data to others and/or the careless use of your personal processing data you receive directly from us.

## 11. WHAT RIGHTS DO YOU HAVE?

If we process your personal data for the purposes set out in this Privacy Policy or if you have reason to believe that we are processing your personal data, then you as a data subject have the following rights under the GDPR:

- **The right to know** – to know (be informed) about the processing of your personal data;
- **The right to access** - to receive confirmation as to whether your personal data is being processed, and if so, to request access to your personal data and receive a copy of it;
- **The right to correct** - to request that inaccurate or incomplete personal data be corrected;
- **The right to object** - to object to the processing of your personal data;
- **The right to withdraw your consent** - when we process data with your consent;
- **The right to limit** - to request that redundant or illegally processed personal data be restricted;
- **The right to delete data/be forgotten** - to request the deletion of illegally processed personal data or those personal data that are no longer necessary to achieve the purposes for which they were collected or otherwise processed;
- **The right to transfer** - to receive your personal data in a systematized computer-readable format and transfer that data to another data controller;
- **The right to complain** - file a complaint with the Estonian Data Protection Inspectorate, but we recommend contacting us first, and we will try to solve all your requests together with you.

### 11.1. Right to know:

In this Privacy Policy, we try to provide you with relevant information about processing your personal data as simply and in detail as possible. The most important information for you can be found in Chapter 14 of the Privacy Policy, which details the purposes of processing personal data, categories of data, legal grounds for the processing, and storage terms. Also, every time we make changes to the Privacy Policy, we will inform you about it in a separate message via Mobile App.

### 11.2. The right to access the processed data:

If you are our customer and have an active Account, then you can generate an up-to-date copy of your personal data unlimited times and at any time via the Self-Service website <https://selfservice.citybee.ee/>. All you need to do is enter the address of the Self-Service website using the Internet browser (note that you will not be able to download a copy of the data through the Mobile App) and perform the following steps:

<https://selfservice.citybee.ee/> - log in to your Account - follow the requested verification steps - after logging in, click on your e-mail address (found at the top of the right side of the window) - click on the "Get your data" link.

If you no longer have an active Account or if there are obstacles to using the Self-Service website, then write us an e-mail at the e-mail address [dpo@citybee.ee](mailto:dpo@citybee.ee) and then we will send you an e-mail a letter with information on how you can obtain a copy of your personal data or contact us using the other contacts specified in Section 12 of the Privacy Policy.

### 11.3. The right to correct personal data:

If the personal data you provided has changed (surname, e-mail address, telephone, driver's license, etc.), or you believe that the information we process about you is inaccurate, you have the right to demand to change, clarify, or correct information.

You can make some changes to your personal data yourself in your Account via the Mobile App (e.g. upload a new driver's license, change your address, etc.). In other cases, you must contact us by e-mail at the e-mail address [dpo@citybee.ee](mailto:dpo@citybee.ee) or other contacts specified in Chapter 14 of the Privacy Policy and ask us to correct or clarify your data.

#### **11.4. The right to object to data processing:**

If we process your personal data on the basis of legitimate interest, we have weighed the opposing interests and decided that taking into account the purpose and means of personal data processing, our (or the relevant third party's) interest in processing your personal data does not exceed your interests or fundamental rights and freedoms, which make it necessary to protect personal data. However, suppose you have reason to believe that our data processing violates your fundamental rights and freedoms. In that case, you can exercise your right as a data subject and limit the data processed.

Accordingly, in cases where we process personal data based on the data controller's legitimate interest (GDPR, Article 6, Paragraph 1, Point f), we process data for direct marketing purposes, you may object to data processing.

To exercise this right, you must contact us by e-mail at the e-mail address [dpo@citybee.ee](mailto:dpo@citybee.ee) or to other contacts specified in Chapter 1 of the Privacy Policy.

#### **11.5. The right to withdraw your consent:**

In cases where we process personal data based on your consent, you have the right to withdraw your consent at any time, and data processing based on your consent will be terminated. For example, you can withdraw your consent to receive marketing offers and various information at any time through any channels we provide (e.g., newsletters, SMS messages, InApp notifications, etc.). Revoking these consents will not prevent you from continuing to use our Services, but it will mean that we will not be able to provide you with valuable offers about our Services. We also note that the withdrawal of consent does not affect the lawfulness of data processing until the withdrawal of consent.

To exercise this right, you can conveniently do so in the following ways:

- you can unsubscribe from the newsletter at any time by clicking the e-mail the "Unsubscribe from newsletters" link in the letter;
- you can easily manage and change newsletters and active notifications in the Mobile App (push notifications) in your Account settings (by clicking on "My Profile" and then by clicking on "Subscription to offers");
- by changing the operating system settings of your device;
- by contacting us by e-mail at the e-mail address [dpo@citybee.ee](mailto:dpo@citybee.ee) or to other contacts specified in Chapter 14 of the Privacy Policy.

#### **11.6. The right to restrict data processing:**

You have the right to restrict our ability to process your personal data. After you limit the processing of your personal data, we will no longer carry out any actions with your personal data other than personal data storage. However, the restriction of personal data may mean that during the restriction period, we may not be able to provide you with the Services, which may result in the suspension or termination of the Service Agreement.

You can limit the processing of personal data in at least one of the following circumstances:

- Your personal data is inaccurate (personal data processing actions, in this case, will be limited until checking the accuracy of the personal data);
- Your personal data is processed illegally, but you do not agree to have your data deleted;
- The company no longer needs your personal data for the specified purposes, but you need them to assert, fulfill or defend legal claims;
- Your personal data is processed based on legitimate interest, and you object to such processing of personal data. In this case, data processing will be limited until it is checked whether the reasons for which we process your personal data are superior to you.

You can limit the processing of your personal data by contacting us by e-mail [dpo@citybee.ee](mailto:dpo@citybee.ee).

#### **11.7. Right to delete data (right to be forgotten):**

You have the right to request that we no longer process your personal data and delete it in the event of at least one of the following circumstances:

- personal data are no longer necessary to achieve the purposes for which they were collected or otherwise processed;

- You revoke the consent on which the data processing was based, and there is no other legal basis for processing the data;
- Your personal data is processed illegally;
- You have submitted an objection to the processing of personal data on the basis of our legitimate interest, and it is proven that your interests are superior in a particular case.

We will consider your request to delete your personal data as a request also to terminate the Service Agreement, which will be terminated in accordance with the procedure provided in the Terms. A request to delete only certain of your personal data may result in the suspension or termination of the Service Agreement or the fact that we will not be able to provide you with all Services. We also note that deleting (uninstalling) your Mobile App will not mean termination of the Service Agreement. It will remain in effect until it is terminated following the Terms or until you request that we delete your data.

If you express a wish to delete all or part of your data, we will no longer actively process your data, which will no longer be necessary for the purposes for which they were collected or otherwise processed, but personal data will be stored according to the established terms, for the following reasons:

- for accounting and tax requirements, personal data will continue to be processed following Article 6(1)(c) GDPR. (processing the data is necessary to fulfill the legal obligation applicable to the data controller);
- GPS (location) data will continue to be processed following Art. 6(1)(f) GDPR. (processing of data is necessary for the legitimate interests of the data controller or a third party);
- to process customer complaints and other appeals, personal data will be processed following Art. 6(1)(b) GDPR. (processing of data is necessary to fulfill the contract to which the data subject is a party);
- to ensure the implementation of the ban on ordering the Services and using them in the future provided for in the Agreement on the Provision of Services, data (reason for termination of the provision of Services, date, period, certain identification data of yours, etc.) will be stored and processed following Art. 6(1)(f) GDPR. (processing of data is necessary for the legitimate interests of the data controller or a third party);
- in the event of disputes, claims, or debt administration, the data will continue to be processed following Art. 6(1)(f) GDPR to secure our other legal requirements and protect rights.. (processing of data is necessary for the legitimate interests of the data controller or a third party).

You can understand the right to "be forgotten" from your personal data by contacting us by e-mail at the e-mail address [dpo@citybee.ee](mailto:dpo@citybee.ee) .

#### **11.8. Right to data portability:**

When data processing is based on your consent (GDPR Article 6(1)(a)) or contract (GDPR Article 6(1)(b)) and is carried out by automated means, you have the right to receive the data you have provided to us in a structured, commonly used and computer-readable format. Also if it is technically possible at your request, your data may be forwarded directly to another data controller specified by you.

We inform you that if you are our Customer and have an active Account, then you can generate an unlimited number of times and at any time a current copy of your personal data and download it to your storage media through the Self-Service website. On the self-service website at <https://selfservice.citybee.lt/> - log in to your Account - complete the requested verification steps - after logging in, click on your e-mail address (found at the top of the right side of the window) - click on the "Get your data" link.

If you no longer have an active Account or if it is impossible to save a copy of your personal data through the Self-Service website, you can contact us by e-mail at the e-mail address [dpo@citybee.ee](mailto:dpo@citybee.ee) or in other ways specified in Chapter 14 of the Privacy Policy.

#### **11.9. Right to file a complaint:**

If you believe that we process your data in violation of personal data protection legislation requirements, please get in touch with us directly first. We believe that with good faith and effort, we will be able to dispel all your doubts, answer your questions, satisfy your requests and correct any mistakes we have made.

If you are not satisfied with our proposed method of solving the problem or, in your opinion, we will not take the necessary actions according to your request. You will have the right to file a complaint with the Estonian Data Protection Inspectorate (*Andmekaitse Inspektsioon*) (Tatari str. 39, 10134 Tallinn, Estonia, e-mail: [info@aki.ee](mailto:info@aki.ee)).

## **12. HOW CAN YOU APPLY FOR THE EXERCISE OF YOUR RIGHTS?**

You can make requests to exercise your rights in the following ways:

- You can exercise your rights by **contacting us via e-mail dpo@citybee.ee** and submitting a free form request. Your request will be accepted and processed only if e-mail from which you contact us matches the e-mail that is linked with your Account. In response to your request, we may send a control message to the last contact in the Account (via SMS and e-mail), asking for an active authorization step and/or requesting additional documents or data.
- **By phone: +372 600 0160** (please note that we cannot exercise all of your rights by phone). When you contact us by phone, we firstly verify your identity by asking you to provide your Account information or other information that only you should know. As part of this verification, we may send a verification message (by SMS or e-mail) to the last contact on your Account, asking you to take active action. If the verification procedure fails, we will have to declare that you are not a data subject and will have to reject your request;
- You can also exercise your rights by **coming to our customer service department** and filling out the application form, in which case we will ask you to show your identity document (we will not keep a copy of the document);

If we have doubts about your identity before taking active steps, we can ask you to provide us with additional documents and evidence, submit a request only in writing and/or sign with a qualified electronic signature, or come to our customer service department. For example, in cases where you do not have an Account, you cannot verify your identity by phone and/or you no longer have the e-mail address provided in the Account phone number.

### 13. HOW DO WE DEAL WITH YOUR REQUESTS?

To protect our customers' data from unauthorized disclosure, we will need to verify your identity upon receipt of your request to exercise your right(s). To confirm a person's identity, we primarily use the methods specified in Section 12 of the Privacy Policy. After receiving your request to exercise your right(s) and when the identity mentioned above verification procedure was successful, we undertake to provide you with information about the actions we took/or did not take in response to your request as soon as possible, but in any case no later than within 1 (one) month from the date of receipt of your request

Remember that your rights are not absolute, and we have the right to refuse to fulfill your request with a reasoned written answer under the conditions and grounds provided by legal acts. Taking into account the complexity and number of requests, we have the right to extend the period of 1 (one) month by another 2 (two) months, informing you about this before the end of the first month and indicating the reasons for such an extension. If your request is submitted electronically, we will also provide you with an answer electronically, unless this is impossible (e.g., due to a substantial amount of information) or when you request to answer another way. We will provide the information to you free of charge, but if the requests are manifestly unreasonable or disproportionate, in particular, due to repetitive content, we may charge a reasonable fee to cover administrative costs or refuse to act on your request.

### 14. YOU CAN CONTACT US:

The data controller that processes your personal data specified in this Privacy Policy is CityBee Eesti OÜ, legal entity code 14646800, address: Harju maakond, Tallinn, Kesklinna linnaosa, Narva mnt 31, 10120.

Data protection officer - in compliance with GDPR requirements, we have appointed a data protection officer whom you can contact regarding all issues of this Privacy Policy and all other data processing issues. **Data protection officer contacts - e-mail: dpo@citybee.ee.**

You can also contact us by phone by calling the general **Customer Service number – +372 600 0160**. In addition, you can also find a lot of relevant information in the Frequently Asked Questions (FAQ) section of our Website.

### 15. DETAILED INFORMATION ABOUT THE PROCESSING OF YOUR PERSONAL DATA:

The following tables are divided into convenient separate categories according to the purposes of the processing and describe in detail the data processing processes, provide detailed information about how we collect, why we collect, for what purposes we use, and how long we store your personal data.

### 15.1. CREATING AN ACCOUNT IN THE MOBILE APPLICATION

<b>When are your personal data processed?</b>	<p>If you wish to start using our Services, you must register and create a personal Account in the Mobile App, as the Services are provided only through the Mobile App and only to Customers with Accounts.</p> <p>To ensure the proper provision of the Services and the operation of the Account, we must collect and process your personal data determined by us (standard) to recognize you as a Customer, to link your personal Account with other data of yours that we manage and to be able to provide services remotely via smartphones devices.</p> <p>After completing the Account creation process, you can immediately see the functionality of the Mobile App, all the Vehicles, and their terms of use. After adding the payment card details, you can immediately use the bicycle rental Services.</p>
<b>Data categories</b>	<p>Name, surname, mobile phone number, email address, residential address, payment card data (name, surname, card type, card number, expiration date);</p> <p>Account data (email and phone number) confirmation records, Account creation date, Terms of Use and Privacy Policy acceptance records, direct marketing consent records, IP address, and technical records.</p> <p>Biometric data to recognize the Customer's face and unlock the Mobile App faster (we draw your attention to the fact that if you give the Mobile App permission to use the functionality of the device that allows you to recognize a fingerprint or facial image, we will not receive and process this data. We will only process the system verification of your device, whether the device user login was successful).</p>
<b>Legal basis for data processing</b>	<p><b>GDPR Article 6(1)(b) - Execution of the contract:</b></p> <ul style="list-style-type: none"> <li>Conclusion of a Service Agreement.</li> </ul>
<b>Data retention period</b>	<p>Suppose you have not completed the registration process and/or have not confirmed your e-mail address and telephone number. In that case, the personal data provided will be deleted after 3 months from the start date of the registration attempt.</p> <p>If you haven't used the Company's Services - during the entire Service Agreement validity period and 3 months after it ends.</p> <p>After you have used the Company's Services - during the entire Service Agreement validity and for 5 years after it ends.</p> <p>Chapter 8 of the Privacy policy lists the cases and conditions when your personal data may be stored or otherwise processed for longer.</p>

### 15.2. CONFIRMATION OF PERSONAL IDENTITY AND SUBMISSION OF DOCUMENTS

<b>When are your personal data processed?</b>	<p>If you intend to rent cars, we must ensure your identity and whether you have the right to drive a vehicle and collect supporting evidence. If we do not do this, we will not be able to provide you with car rental Services.</p> <p>In cases where you are from a third country (i.e., not a citizen of the EEA), the driver's license you submitted does not have a personal identification number, or the driver's license or photo provided raises suspicions, before allowing you to use the Services, we will contact you via video call, during which we will ask you to show an additional identification document and dictate your personal code or another identification number or code corresponding to it (for example, in cases where a personal code is not provided), which we will save in our system.</p> <p>If you do not agree or cannot submit your face photo (selfie) and/or driver's license data through the Mobile App for identity and driving license verification, you can contact us, and depending on the circumstances, we</p>
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	may be able to offer you an acceptable alternative method of data submission.
<b>Data categories</b>	<p>Face image (selfie), face image with driver's license in hand (selfie), photo of the first side of the driver's license;</p> <p>Name, surname, personal identification number or another identification number, date of birth, driver's license number, expiration date, photo of the Customer's face from the driver's license, state, and authority that issued the driver's license;</p> <p>Data for verifying the authenticity and validity of the driver's license, data for checking the correspondence between the face image and the photo on the driver's license, and the date of uploading the driver's license to the Account.</p>
<b>Additional categories of data, if it is necessary to check your identity and/or the accuracy and completeness of the data provided by the video call</b>	<p>Date and time when the video call took place;</p> <p>Personal code or another identification number (collected during the conversation and recorded in your Account).</p> <p>The employee's comment with the reason if you did not pass the identity verification or document verification process during the video call.</p>
<b>Legal basis for data processing</b>	<p><b>GDPR Article 6(1)(b) – Execution of the contract:</b></p> <ul style="list-style-type: none"> <li>• Execution and administration of the Service Agreement;</li> <li>• to ensure that the identity of the Company's Customers is appropriately verified and the use of the identity of other persons is prevented.</li> </ul> <p><b>GDPR Article 6(1)(c) – The legal obligation applies to the Company:</b></p> <ul style="list-style-type: none"> <li>• ensure that only persons with the right to drive can use the Company's Services (<i>Traffic Act</i>).</li> </ul> <p><b>GDPR Article 9(2)(a) – Consent:</b></p> <ul style="list-style-type: none"> <li>• process the face image (selfies).</li> </ul>
<b>Data retention period</b>	<p>If you haven't used the Company's Services - during the entire Service Agreement validity period and 3 months after it ends.</p> <p>After you have used the Company's Services - during the entire Service Agreement validity and for 5 years after it ends.</p> <p>The video call is not recorded and stored.</p> <p>Chapter 8 of the Privacy policy lists the cases and conditions when your personal data may be stored or otherwise processed for longer.</p>

### 15.3 USE OF THE MOBILE APPLICATION

<b>When are your personal data processed?</b>	<p>When you use the Mobile App, we register information about your actions in the Mobile App and your Account and process your various personal data. We do so to ensure the fulfillment of the Terms of the Service Agreement and the smooth operation, integrity, and security of the Mobile App and information systems.</p> <p>Also, data is collected and processed to identify a possible threat of abuse of the Services, fraud, or other illegal activity to protect the Mobile App, information systems, and data from unauthorized changes, cyber attacks, unauthorized access, and other related risks.</p>
<b>Data categories</b>	<p>Data about connecting to the Mobile App, data about the device's operating system, Mobile App version, unique device number (created by the Company), Account usage history, incl. settings, parameters, and changes, various usage records, technical records;</p> <p>Direct marketing consents and/or withdrawals, Mobile app reading records of important messages;</p> <p>Account information, records of acceptance of new terms of use and/or</p>

	<p>confirmation of familiarization with the privacy policy;</p> <p>Device GPS coordinates (service start location, service end location, Mobile Application opening location) only if Customers have agreed to the GPS setting and granted permission.</p> <p>The date and time of joining the Self-Service through the Website and using the Self-Service.</p>
<b>Legal basis for data processing</b>	<p><b>GDPR Article 6(1)(b) – Execution of the contract:</b></p> <ul style="list-style-type: none"> <li>Execution and administration of the Service Agreement.</li> </ul> <p><b>GDPR Article 6(1)(a) – Consent:</b></p> <ul style="list-style-type: none"> <li>Device GPS data management for the convenient provision of the Service to the Client, to provide the Client with accurate distances from his location to the Vehicles.</li> </ul>
<b>Data retention period</b>	<p>Various system and technical records - 3 months from the date of their creation;</p> <p>GPS data - 12 months from the date of its creation;</p> <p>If you haven't used the Company's Services - during the entire Service Agreement validity period and 3 months after it ends.</p> <p>After you have used the Company's Services - during the entire Service Agreement validity and for 5 years after it ends.</p>

#### 15.4 USE OF THE SERVICES

<b>When are your personal data processed?</b>	<p>When you use the Services, i.e., Vehicle rental, we collect various information about the use of the Services and your actions to ensure fulfillment of the terms of the Agreement and the smooth provision, integrity, and security of the Service.</p> <p>Also, all data generated and collected during the Services, including personal data about your use of our Services, help us to carry out the traceability and accuracy of the Services provided and is also used to protect our interests if there are noticeable illegal actions that are considered as part of the Service Agreement violation.</p> <p>Suppose you connect your device to the Vehicle's devices (e.g., navigation, multimedia systems) while using the Vehicle. In that case, your device's data, such as your given name, device-stored contacts, and Bluetooth ID, will be stored in the Vehicle unless you remove them following the Vehicle manufacturer's instructions.</p>
<b>Data categories</b>	<p>Vehicle reservation date and time, Vehicle use date and time, Vehicle locking/unlocking time, Service start and Service end, route, speed, travel distance, duration, fuel consumption, and fuel card usage fact. Other technical Vehicle parameters, Vehicle GPS coordinates data;</p> <p>The price of the Service, the amount of payment for the Services, On-cumulative discount level, On- coupon amount granted and redeemed, the fact of issuing the invoice, the fact and amount of the debt, and the maximum amount owed by the Client for the Services provided. Purchases of subscriptions or package tickets, transfers of funds to a virtual wallet, the amount in the wallet and information about its use, as well as other data of the completed payment transactions (date, amount, last four digits of the payment card, etc.);</p> <p>Discounts, coupons and/or codes, participation in programs (such as fuel refills), their validity, and use.</p>
<b>Additional data categories when using Premium class cars</b>	<p>Age of the Client, number of trips made.</p> <p>Video material that captures a traffic and/or other event (up to 30 seconds long), which may contain images of the Client's and/or other persons' faces.</p>

<b>Legal basis for data processing</b>	<b>GDPR Article 6 (1)(b) - Execution of the contract:</b> <ul style="list-style-type: none"> <li>Execution and administration of the Service Agreement.</li> </ul>
<b>Data retention period</b>	<p>After you have used the Company's Services - during the entire Service Agreement validity and for 5 years after it ends.</p> <p>Video material recorded by the video camera in Premium Class Vehicles (only in which traffic and/or other events are recorded) is stored for 30 calendar days from the date of creation.</p> <p>If the recorded video material is used to conduct an internal and/or external investigation, in this case, this video material is stored until the date of completion of the relevant investigation.</p> <p>Chapter 8 of the privacy policy lists the cases and conditions when your personal data may be stored or otherwise processed for longer.</p>

### 15.5.PERIODIC CHECK OF THE VALIDITY OF YOUR DRIVER'S LICENSE AND/OR RENEWAL OF YOUR DRIVER'S LICENSE

<b>When are your personal data processed?</b>	<p>When you use Vehicles (cars), we have the right to periodically check your driver's license's validity to ensure that your right to drive has not been restricted.</p> <p>Also, if we notice that your driver's license expires, we can contact you (by e-mail, SMS, active messages, and other messages in the Mobile app) and inform you about the expiration of your driver's license, which you will have to renew if you wish to continue to use the Services.</p>
<b>Data categories</b>	<p>Date and time of driver's license approval, results of approval (valid, invalid, suspended);</p> <p>Copy of the new driver's license, name, surname (if changed), person, driver's license number, expiration date, photo of the Customer's face from the driver's license, the state and the institution that issued the driver's license, and the date of adding a new copy of the driver's license to the Account.</p>
<b>Legal basis for data processing</b>	<b>GDPR Article 6 (1)(c) – Legal obligation applicable to the Company:</b> <ul style="list-style-type: none"> <li>ensure that only persons with the right to drive can use the Company's Services ((<i>Traffic Act</i>)).</li> </ul>
<b>Data retention period</b>	<p>After you have used the Company's Services - during the entire Service Agreement validity and for 5 years after it ends.</p> <p>Chapter 8 of the Privacy policy lists the cases and conditions when your personal data may be stored or otherwise processed for longer.</p>

### 15.6.MOBILITY MONITORING THROUGH GPS COORDINATES (LOCATION DATA PROCESSING)

<b>When are your personal data processed?</b>	<p>An electronic system is installed in every Vehicle, which enables you to choose and reserve a Vehicle from any place and conveniently use it and leave it in the permitted zone with the help of the Mobile App.</p> <p>This electronic system also registers and transmits to us the Vehicle's location, the distance traveled by the Vehicle, speed, and other data related to the Vehicle. Mobility data is essential to us because, with their help, we can smoothly organize the distribution of Vehicles, determine their location, and have accurate travel traceability to ensure our own and/or third parties legitimate interests (especially relevant in the case of theft, damage and Road Traffic violations).</p> <p>Also, in exceptional cases, when the Vehicle's electronic system records data that may cause danger to you, the Vehicle, and other road users (e.g., extremely high speed), we have the right to contact you by automatic means (e.g., automatic call or message) and to report an ongoing violation of the terms of the Service Agreement, which may cause damage to you and other road users.</p>
<b>Data categories</b>	Vehicle GPS data associated with a specific Customer, GPS coordinates,

	date and time of use of the Vehicle, route, speed, travel distance, duration, GPS coordinates of where the Vehicle was picked up and left.
<b>Additional data categories for automatic speeding calls</b>	Vehicle GPS data linked to a specific Customer, GPS coordinates, date and time of Vehicle use, route, speed, travel distance, duration; Date and time of automatic call and/or SMS sending.
<b>Legal basis for data processing</b>	<p><b>GDPR Article 6(1)(b) – Execution of the contract:</b></p> <ul style="list-style-type: none"> <li>• Execution of the Service Agreement;</li> <li>• Identify the identity of the Client who has committed road traffic and/or other violation and to have supporting evidence;</li> <li>• Identify violations of the Service Agreement.</li> </ul> <p><b>GDPR Article 6(1)(c) – The legal obligation applies to the Company:</b></p> <ul style="list-style-type: none"> <li>• the obligation to report your data in case of an administrative offense (<i>General Part of the Civil Code Act</i>).</li> </ul> <p><b>GDPR Article 6(1)(f) – Legitimate interest of the Company and third parties:</b></p> <ul style="list-style-type: none"> <li>• to ensure the protection of vehicles and other assets of the Company, as well as the safety of third parties and their assets;</li> <li>• ensure road traffic safety using our services and vehicles;</li> <li>• reduce the number of traffic accidents due to speeding.</li> </ul>
<b>Data retention period</b>	GPS data - 12 months from the date of its creation.
	Automated calls and SMS are not recorded or saved
	After you have used the Company's Services - during the entire Service Agreement validity and for 5 years after it ends.
	Chapter 8 of the Privacy policy lists the cases and conditions when your personal data may be stored or otherwise processed for longer.

### 15.7.ACCOUNT BLOCKING AND/OR TERMINATION OF SERVICE CONTRACT

<b>When are your personal data processed?</b>	<p>The Services provided by us are subject to the established Terms of Service, which you agreed to before starting to use the Mobile App and concluding a Service Agreement with us (<a href="https://citybee.ee/en/terms-of-use/">https://citybee.ee/en/terms-of-use/</a>).</p> <p>Therefore, we have the right to collect information related to the use of the Services, to respond to received information related to violations of the Service Agreement, and to take active actions when gross violations of the Service Agreement, provided for in the Rules, are detected.</p> <p>Accordingly, when we detect violations of the Service Agreement, we usually temporarily block the Account, according to the terms set by us. However, in cases where the violations are extremely serious (e.g., drunk driving, constant speeding, causing a major accident), then we have the right to terminate the Service Agreement with you and, accordingly, add you to the list of blocked persons, so that you cannot use the Services in the future.</p>
<b>Data categories</b>	All data about the Customer, available from the Account and the use of the Services; Circumstance/reason for blocking or termination of the Agreement, basis, comment of the employee who performed the blocking or termination of the Agreement, duration of the blocking; Blocking list (Customer name, date of birth, blocking date and blocking term).
<b>Legal basis for data processing</b>	<p><b>GDPR Article 6(1)(b) - Execution of the contract:</b></p> <ul style="list-style-type: none"> <li>• Execution of the Service Agreement;</li> <li>• monitor how the Client uses the Services and fulfills/does not fulfill the terms of the Service Agreement.</li> </ul> <p><b>GDPR Article 6(1)(f) - Legitimate interest of the Company and third parties:</b></p> <ul style="list-style-type: none"> <li>• prohibit blocked Customers and/or those with whom the Service Agreement was terminated from creating a new Account</li> </ul>

	(inclusion in the blocking list);
<b>Data retention period</b>	<p>After you have used the Company's Services - during the entire Service Agreement validity and for 5 years after it ends.</p> <p>In case of serious violations, Clients (minimum data) are stored in the blocking list for 10 years after the Service Agreement's termination date.</p>

### 15.8.ADMINISTRATION OF INQUIRIES, REQUESTS, COMPLAINTS, AND OTHER COMMUNICATIONS WITH YOU

<b>When are your personal data processed?</b>	If you contact us by phone and/or in writing (e-mail, via Mobile application, social networks, or otherwise), we will save the fact of your application and the information provided, including personal data, so that we can properly examine your application and answer your question, request or complaint.
<b>Data categories</b>	<p>When contacted by phone: first name, last name, mobile phone number, e-mail mailing address, residential address, travel details, and other information required to complete the Customer verification. Date and time of the call, call duration and call recording.</p> <p>By contacting e-mail by mail / or through the Mobile App: name, surname, mobile phone number, e-mail address, residential address. Travel data and other information are required to complete the Customer's confirmation. Additional information related to the written request and correspondence history;</p> <p>In providing this Customer Service, additional and sensitive information may be used or disclosed: driver's license information, information about the incident, traffic incident, passenger information, detailed description of the specific accident and/or problem, detailed circumstances of the complaint or other request, complaint and/or documents proving the accident.</p>
<b>Additional categories of data if we need to contact you for important reasons</b>	<p>Your name, surname, mobile phone number, e-mail address, location address, date and time of the call, call duration, and call recording.</p> <p>The name of the electronic message/SMS message sent to you, the fact and date of delivery of the message, the fact, and date of opening (reading) of the message, the fact and date of opening the link provided in the content of the message.</p>
<b>Legal basis for data processing</b>	<p><b>GDPR Article 6(1)(b) – Execution of the contract:</b></p> <ul style="list-style-type: none"> <li>Service Agreement administration.</li> </ul> <p><b>GDPR Article 6(1)(a) – Consent:</b></p> <ul style="list-style-type: none"> <li>to answer, consult, provide and administer the Services when any person initiates the first conversation.</li> </ul>
<b>Data retention period</b>	<p>Complaints, claims, and written requests related to the execution of the Service Agreement and/or which may be related to disputes - during the entire validity of the Service Agreement and for 5 years after it ends.</p> <p>Call recordings are stored for 6 months from the moment of creation.</p> <p>Chapter 8 of the Privacy policy lists the cases and conditions when your personal data may be stored or otherwise processed for longer.</p>

### 15.9.DIRECT MARKETING

<b>When are your personal data processed?</b>	<p>We process your personal data to be able to provide general and/or personal offers (including offers from our partners) and other information about the Services we provide that may be relevant to you. We can send you notifications, offers, and information in several ways: by e-mail, SMS, or Mobile application notifications (inactive and/or active).</p> <p>You can easily object to the sending of messages with offers and</p>
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	information during the creation of an Account in the settings of the Mobile App, or you can easily opt out of them at any time later in the settings of the Mobile App (in the section Subscription to offers) or by clicking on the opt-out link in the newsletters sent.
<b>Data categories</b>	Name, surname, e-mail postal address and/or telephone number, customer identifier (internal customer number), country, city, age; customer type (private / business customer).  Information and history of direct marketing consents/withdrawals.
<b>Legal basis for data processing</b>	<b>GDPR Article 6(1)(a) – Consent:</b> <ul style="list-style-type: none"> <li>• Send you our marketing material via email;</li> <li>• Send you active messages in the Mobile App;</li> <li>• Send you marketing material via SMS;</li> <li>• Send you offers and information from our partners.</li> </ul> <b>GDPR Article 6(1)(f) - Legitimate interest of the Company and third parties (§ 1031 (3) of the Estonian Electronic Communications Act):</b> <ul style="list-style-type: none"> <li>• To send you general and personalized offers and information by e-mail; - Send you active messages in the Mobile App.</li> </ul>
<b>Data retention period</b>	Personal data is processed as long as consent is valid, i.e. consent is withdrawn.  If you haven't used the Company's Services - during the entire Service Agreement validity period and 3 months after it ends.  After you have used the Company's Services - during the entire Service Agreement validity and for 5 years after it ends.

#### 15.10. OPTIMIZATION OF MARKETING INSTRUMENTS

<b>When are your personal data processed?</b>	<p>We use automated data analysis and decision-making, including profiling, to provide you with personalized content and recommendations, marketing offers tailored specifically to you and/or to provide you with our other possible benefits, and to enable us to expand the range of Services offered and improve the Services we provide. We use automatic means to group and analyze your data processed for the respective purpose and make insights and predictions about what content and/or messages may be relevant to you. To get to know our Customers, their needs, and interests even better, we may also categorize Customers based on various characteristics (such as age, location, browsing and/or Service usage habits, etc.).</p> <p>The described actions do not have any legal or similarly significant effect on you, but they will allow us to understand your needs, interests, and hobbies better, to create and offer you more diverse Services that better meet your needs, to install the updates of the Mobile App you are waiting for, to provide a better quality experience using our Services, etc.</p> <p>To more effectively administer the various marketing tools we use, we use various third-party tools that help us perform accurate analysis, such as Apps Flyer, Clever tap, Google Firebase, Google Ads, Google Analytics, Facebook Ads manager and other advanced tools that with help, we can collect your data related to your behavior on the Mobile App, Website, Social Networks.</p>
<b>Data categories</b>	Technical information related to the device used, such as browser type, device type, and model, processor, system language, memory, OS version, IP address, User agent, IDFA (identifier for advertisers), Android ID " devices); Google Advertiser ID, and other similar unique identifiers. Engagement information, i.e., information related to ad campaigns and final customer actions, such as clicks on ads, impressions of ads viewed, audiences or segments assigned to an ad campaign, type of ads, and web page or application where such ads were displayed, web pages, visited by the end user, URLs from the referring website, app downloads and installs, and other interactions, events, and customer actions within the app (such as car selected, trips booked, clicks, engagement time, etc.).

	Another history of your browsing in the Mobile App and/or Website.
<b>Legal basis for data processing</b>	<b>GDPR Article 6(1)(f) - Legitimate interest of the Company and third parties:</b> <ul style="list-style-type: none"> <li>• implement automated devices to optimize marketing processes;</li> <li>• Group and divide customers into groups, test the marketing tools used, and organize the automated use of marketing tools for the most effective customer engagement.</li> </ul>
<b>Data retention period</b>	If you haven't used the Company's Services - during the entire Service Agreement validity period and 3 months after it ends.
	After you have used the Company's Services - during the entire Service Agreement validity and for 5 years after it ends.
	Data that is anonymized and cannot be linked to any specific Customer and/or only statistical data is stored indefinitely for as long as it is needed to achieve the respective intended purpose

### 15.11. ADMINISTRATION OF SOCIAL NETWORKS

<b>When are your personal data processed?</b>	<p>We administer our profiles and accounts on various social networks, such as: <a href="https://www.facebook.com/CityBeeEstonia">https://www.facebook.com/CityBeeEstonia</a>, <a href="https://www.instagram.com/citybeeestonia/">https://www.instagram.com/citybeeestonia/</a>, <a href="https://www.linkedin.com/company/citybee-car-sharing">https://www.linkedin.com/company/citybee-car-sharing</a> etc.</p> <p>If you are interested in our Services and follow our profiles on social networks, participate in our published games, promotions, you share your photo with us or tag us in your photo or post etc., we collect and use your data, which we receive directly from you when you perform active actions on our profile. It should be noted that our accounts are integrated into social network platforms (e.g., Facebook, Instagram, LinkedIn, etc.), so all social platform providers have all the opportunities to collect your other personal data.</p> <p>You can find detailed information about the data processing carried out by each social network platform and the purposes and scope of data use in the privacy policy of the respective social network. If you want to exercise your rights related to the data processed in social networks, it would be more efficient for you to contact the manager of the relevant social network directly.</p>
<b>Data categories</b>	Name, surname, gender, country, photo, information about communication in the account ("like", "follow", "comment", "share", etc.), messages sent, information about messages (time of receiving the message, content of the message, messages attachments, correspondence history, etc.), comments, reactions to published posts, shares, information about participation in events and/or games organized by us. A photo sent/tagged to us and its public sharing.
<b>Legal basis for data processing</b>	<b>GDPR Article 6(1)(a) – Consent:</b> <ul style="list-style-type: none"> <li>• to process your data when you voluntarily perform active actions on our social network accounts.</li> </ul>
<b>Data retention period</b>	<p>The provider of the respective social network determines the data retention periods. We recommend checking the privacy policy of the respective social network.</p> <p>Accordingly, we review the posts on our social networks that are no longer relevant and, if necessary, delete them.</p>

### 15.12. ADMINISTRATION OF FINES FOR SEVERAL TRAFFIC RULES AND PARKING VIOLATIONS

<b>When are your personal data processed?</b>	<p>Taking into account the terms of the Service Agreement, the applicable legislation, and our rights and legitimate interests, we have the right and, in certain cases, the obligation to disclose information about you and your traffic violations (e.g., speeding, driving intoxicated) to the competent authorities (e.g., the police). Also, disclose your data to municipalities and parking lot owners so that fines received are rewritten in your name.</p> <p>We act in this way following the requirements of the law, protecting our interests, and so that you, as a possible violator of the relevant activity,</p>
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	can defend your rights and dispute the validity of the fine if you believe that the violation was recorded incorrectly.
<b>Data categories</b>	<p>All data about the Customer, available from the Account and the use of the Services;</p> <p>The fact of a parking violation, written documents about inquiries and requests for information, data disclosed by the Customer and the date of disclosure;</p> <p>The fact of violation of traffic rules, written documents about inquiries and requests for information, data disclosed by the Client, date of disclosure.</p>
<b>Legal basis for data processing</b>	<p><b>GDPR Article 6(1)(c) – The legal obligation applies to the Company:</b></p> <ul style="list-style-type: none"> <li>the obligation to report your data in case of an administrative offense (<i>General Part of the Civil Code Act</i>).</li> </ul> <p><b>GDPR Article 6(1)(f) – Legal interests of the Company and third parties:</b></p> <ul style="list-style-type: none"> <li>we have the right to transfer information about violations of parking rules and road traffic rules to the competent authorities so that the received fine for the violation is forwarded to the customer who committed the violation.</li> </ul>
<b>Data retention period</b>	<p>After you have used the Company's Services - during the entire Service Agreement validity and for 5 years after it ends.</p> <p>Chapter 8 of the Privacy policy lists the cases and conditions when your personal data may be stored or otherwise processed for longer.</p>

### 15.13. ADMINISTRATION OF DEBT AND DAMAGES AND SECURITY OF LEGAL CLAIMS AND INTERESTS

<b>When are your personal data processed?</b>	<p>To the extent permitted by applicable legislation, we have the right to administer, manage, collect, and/or submit for collection Your debts for unpaid Services and financial damage caused to us and/or our property.</p> <p>We also process your personal data to implement our legal requirements and the defense of legitimate interests (including fraud prevention), protect the property and interests of ourselves, our clients, and others, gather evidence of violations and prevent violations of our interests, our clients and others, misuse of the Mobile App, Website, Vehicles, our Services.</p>
<b>Data categories</b>	<p>All data about the Customer, available from the Account and the use of the Services;</p> <p>Information about debt(s), amount of debt, reminders, and calls to pay by e-mail, mail, repayment history, payment plan, and date of debt closing/discharge;</p> <p>If the service of a debt collection company is used: Customer's name, surname, personal identification number or other personal code, residential address, e-mail address, telephone number, date of transfer of the debt to the collection company, debt, active actions of the debt collection company, repayment history and debt closing/ write-off date.</p> <p>The facts of the damage related to the Company/Vehicle/third parties, driver's license data, and all evidence and documents related to the damage.</p> <p>Insurance cases and other related information;</p> <p>Information about other persons in the Vehicle and/or who drove it.</p> <p>Information about the amount of damage, the fact of payment, payment plans, the debt incurred, etc.</p>
<b>Legal basis for data processing</b>	<p><b>GDPR Article 6(1)(f) - Legal interests of the Company and third parties:</b></p> <ul style="list-style-type: none"> <li>ensure the collection of fees for services provided;</li> <li>debt administration, damage management;</li> <li>to administer, manage and recover damages caused to the Company's property or a related third party;</li> </ul>

<b>Data retention period</b>	After you have used the Company's Services - during the entire Service Agreement validity and for 5 years after it ends.
	Chapter 8 of the Privacy policy lists the cases and conditions when your personal data may be stored or otherwise processed for longer.

#### 15.14. EXECUTION OF TAX, ACCOUNTING, AND OTHER OBLIGATIONS PROVIDED BY LAW

<b>When are your personal data processed?</b>	To ensure the proper implementation of the tax, accounting, and other legal obligations (i.e., correct writing and declaration of accounting documents to state institutions, implementation of money laundering prevention requirements, etc.), we create various accounting documents with your personal data and administer them.
<b>Data categories</b>	Name, surname, residential address, personal identification number, VAT payer code (when the person is registered as a VAT payer); Data about the Service (Description of the Service; price/amount paid), issued accounting documents and their requisites, and other accounting and tax data that the Company must collect, process and store following laws and other legal acts.
<b>Legal basis for data processing</b>	<b>GDPR Article 6(1)(c) – Legal obligations and requirements of legal acts (based on Accounting Act):</b> <ul style="list-style-type: none"> <li>• Accounting, taxes, and other public obligations;</li> <li>• Money laundering prevention (as applicable);</li> <li>• Protection of consumer rights.</li> </ul>
<b>Data retention period</b>	In most cases, the storage and deletion period is calculated from the date of creation of the accounting document - 10 years after the creation of the document (e.g. VAT invoices)
	After you have used the Company's Services - during the entire Service Agreement validity and for 5 years after it ends.
	Chapter 8 of the Privacy policy lists the cases and conditions when your personal data may be stored or otherwise processed for longer.

#### 15.15. ADMINISTRATION OF BUSINESS CUSTOMER ACCOUNTS

<b>When are your personal data processed?</b>	<p>If the Agreement for the provision of Services with us is concluded by a business client (company, institution, organization) (hereinafter referred to as the Business Client), we accordingly process the personal data of the employees and representatives of such business client, which are specified in this Privacy Policy (for all the purposes listed above). Employees and representatives of business customers have all data subject rights outlined in Section 11 of this Privacy Policy. The Business Client must inform its employees or representatives about processing their personal data, as specified in the contract between the Business Client and the Company.</p> <p>If Business customers act as data controllers of their employees, or representatives (i.e., when information is available to them through the Mobile Application and they use it for their own purposes), we are not responsible for this, and the provisions of this Privacy Policy do not apply to such processing operations.</p>
<b>Data categories</b>	<p>Company name, address, company registration code, VAT code, payment card data (card type, last four digits of card number, expiration date), Service Agreement;</p> <p>Name, surname, position, e-mail address, telephone number, and other information of the person responsible for the execution of the service contract;</p> <p>Name, surname, position, e-mail address, and telephone number of the employee who has been granted the right to use the Company's business account;</p> <p>When employees use the Services through business accounts, all other data is collected and/or generated through the use of the Services and processed as specified for all other data processing purposes.</p>

<b>Legal basis for data processing</b>	<p><b>GDPR Article 6(1)(b) - Execution of the contract:</b></p> <ul style="list-style-type: none"> <li>Conclusion and execution of the Service Agreement.</li> </ul> <p><b>GDPR Article 6(1)(f) - Legal interests of the Company and third parties:</b></p> <ul style="list-style-type: none"> <li>Process business clients employees data</li> </ul>
<b>Data retention period</b>	<p>If you haven't used the Company's Services - during the entire Service Agreement validity period and 3 months after it ends.</p> <p>After you have used the Company's Services - during the entire Service Agreement validity and for 5 years after it ends.</p> <p>Chapter 8 of the Privacy policy lists the cases and conditions when your personal data may be stored or otherwise processed for longer.</p>

#### 15.16. STATISTICS, ANALYTICS, CUSTOMER BEHAVIOR RESEARCH

<b>When are your personal data processed?</b>	<p>To monitor, evaluate, analyze, improve and improve the quality of the provision of Services, the Mobile App, offer new or new quality Services, increase the availability of the Services, increase the security of using the Services, improve the user experience using the Services, we analyze various statistical data. Data analysis actions performed for the purposes described in this section have no legal or similarly significant effect on you.</p> <p>It is also important to mention that when performing analytics and statistics, we process non-personalized aggregated data and do not process your contact or other personalizing information. That is, analytical and statistical data do not allow the identification of a specific customer, are not linked to other data of the identified user, and are not combined into data sets based on a particular customer.</p>
<b>Data categories</b>	<p>Vehicle reservations, location and time of their locking/unlocking, Vehicle information, start of reservation, date and time of use, places where the Vehicle was picked up and left, Vehicle GPS data, route, speed, travel distance, duration, fuel and fuel card usage, other travel parameters, travel history, telemetry data, all other data generated during the Services, which are created and used in our activities only as statistical data and are not connected to specific customers.</p> <p>Analysis of your Profile, age, country, city, and frequency of use of Services.</p>
<b>Legal basis for data processing</b>	<p><b>GDPR Article 6(1)(f) - Legal interests of the Company and third parties:</b></p> <ul style="list-style-type: none"> <li>follow performance results and analyze them;</li> <li>to implement and use data analysis and processing modules and methods to create and increase value for the Client and the Company;</li> </ul>
<b>Data retention period</b>	<p>Created sets of statistical documents are stored for no longer than 36 months after data generation (some analytics do not require a long data retention period, so they can be deleted earlier).</p>

#### 15.17. WEBSITE ADMINISTRATION, SERVICE, IMPROVEMENT

<b>When are your personal data processed?</b>	<p>When you visit and browse our Website, to collect statistical data and improve the quality of the Service and the experience of visitors, we process the data of the cookies used on the Website and analyze them using the analytical service Google Analytics, which allows you to record and analyze statistical data on the use of the website. More information about Google Analytics and the information collected by its tools can be found here:</p> <p><a href="https://support.google.com/analytics/answer/9019185?hl=en&amp;ref_topic=2919631#zippy=%2Cin-this-article">https://support.google.com/analytics/answer/9019185?hl=en&amp;ref_topic=2919631#zippy=%2Cin-this-article</a>.</p> <p>You can find more information about the cookies used on the Website in our Cookie Policy here: <a href="https://citybee.lt/lt/slapuku-politika/">https://citybee.lt/lt/slapuku-politika/</a>.</p>
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<b>Data categories</b>	IP address, MAC address, date of visit, duration, pages visited, devices and programs used for Internet browsing, etc.
<b>Legal basis for data processing</b>	<b>GDPR Article 6 (1)(a) – Consent:</b> <ul style="list-style-type: none"> <li>manage your data when you have agreed that we will track your actions on the Website with the help of cookies</li> </ul>
<b>Data retention period</b>	See in the Cookie Policy.

#### 15.18. ORGANIZATION OF COMPETITIONS, EVENTS AND ADVERTISING CAMPAIGNS

<b>When are your personal data processed?</b>	<p>When you participate in our various contests, games, events and advertising campaigns, we collect and process your personal data in order to include you in the selected contest activities.</p> <p>Also, when conducting public events and/or advertising campaigns in which you participate, we also additionally create various filmed and photographed materials, which we use to increase awareness of our activities. If you were captured during a public event, then we may use your image (in a limited sense) for the representative purposes of that event.</p> <p>If you participated in a photo session and/or filming organized by us, then we will use your image (in a broad sense) for advertising purposes and we will enter into an appropriate agreement with you regarding the use of the image.</p>
<b>Data categories</b>	<p>Name, surname, e-mail address, tel. number, post comments, post shares, information about being discussed in the network account and "following" in the social network account, reactions to the post, photo, message, time of receipt, message content, messages to messages, reply to reply, submission of reply to reply. time, event participation information, rating information, photos or videos - if they are for the competition as part of the conditions of participation.</p> <p>The image can be seen in the photograph, the image and/or sound recording in the video material, the event, the event data.</p>
<b>Legal basis for data processing</b>	<p><b>GDPR Article 6(1)(a) – Consent:</b></p> <ul style="list-style-type: none"> <li>for monitoring the implementation of the conditions of tender participants and in case of contact with the winner;</li> <li>carry out photo shoots and other advertising campaigns and share the results.</li> </ul> <p><b>GDPR Article 6(1)(f) – Legal interests of the Company and third parties:</b></p> <ul style="list-style-type: none"> <li>capture and use images and/or videos from events organized by us for representational purposes.</li> </ul>
<b>Data retention period</b>	<p>Contest participants' data is stored for - 1 year from the date of announcement of the contest winner.</p> <p>In the case of public events and advertising campaigns, the created results are made public - 5 years from the day of the event or the day of giving consent.</p> <p>The created results are stored for campaign archiving purposes - 10 years.</p>

#### 15.19. PROVISION OF THE MYBEE SERVICE

<b>When are your personal data processed?</b>	<p>An additional service - MyBee long-term car rental service, provided by another legal entity MyBee Estonia OÜ (Separate data controller) is available to our Service Customers in the mobile app.</p> <p>Accordingly, for you to order MyBee services, we transfer your personal data named below to the MyBee service provider, which is intended to conclude a long-term car rental contract with you. We also provide additional services to the MyBee service provider that are part of the Mobile Application's functions (e.g. identification and driver's license</p>
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	<p>verification, service payment administration services, service contract mediation, etc.), and during the provision of these services and during data transmission. we act as the processor of your personal data, according to the instructions of MyBee Estonia OÜ.</p> <p>When ordering MyBee services, you must familiarize yourself with the rules applicable to the provision of MyBee services and the MyBee privacy policy, which will contain detailed information about your personal data collected and processed during the provision of MyBee services.</p>
<b>Data categories</b>	<p>Name, surname, mobile phone number, e-mail address, residential address, payment card data (name, surname, card type, card number, expiration date);</p> <p>Face image (selfie), face image with driver's license in hand (selfie), photo of the first side of the driver's license;</p> <p>Name, surname, personal identification number or other identification number, date of birth, driver's license number, expiration date, photo of the Customer's face from the driver's license, state and authority that issued the driver's license;</p> <p>Data for verifying the authenticity and validity of the driver's license, data for verifying the correspondence of the face image and photo on the driver's license.</p>
<b>Legal basis for data processing</b>	<p><b>GDPR Article 6 (1)(b) – Execution of the contract</b></p> <ul style="list-style-type: none"> <li>• transfer your data when you wish to conclude a contract with MyBee Estonia OÜ.</li> </ul>
<b>Data retention period</b>	<p>You can learn more about your personal data collected and processed during the provision of MyBee services and how long they are stored in MyBee's privacy policy. You can find it at <a href="https://mybee.lt">https://mybee.lt</a>.</p>

**END OF PRIVACY POLICY**