



PRIVACY POLICY

of the Pikyrent sharing mobility service

1. Who is Pikyrent?

This document (hereinafter, "Privacy Policy") is issued on behalf of the Data Controller: Pikyrent Srl (hereinafter "**Pikyrent**"), a private limited liability company under Italian law, with registered office in Rozzano (MI), located at Strada 4, palazzina Q, Postcode 20089, tax code and VAT number 10904840963.

For a correct understanding of the Privacy Policy, please refer to the definitions contained in the General Terms and Conditions of Contract on the Pikyrent Website and/or App.

Pikyrent as the Data Controller undertakes to ensure that the processing of personal data carried out by Pikyrent complies with EU rules on the protection of personal data, more precisely EU Regulation 2016/679 (*General Data Protection Regulation*, hereinafter "**GDPR**") and its principles. Pikyrent ensures the safe, ethical and transparent processing of all personal data and implements the necessary measures to allow data subjects to exercise their rights.

The *Data Protection Officer* (or simply "DPO") appointed by Pikyrent supervises the respect and constant compliance of the processing of personal data with the GDPR. If you have any questions about this policy, including questions about your rights under the GDPR, please contact the DPO at: compliance@pikyrent.com

Pikyrent respects the privacy of the User (also called "Data Subject") and undertakes to protect their personal data. To this end, this Privacy Policy provides the User with all the information on how Pikyrent processes their personal data and also illustrates to the User their privacy rights and the protections offered by the law when the User:

- (i) visits the Pikyrent website at www.pikyrent.com,
- (ii) uses the Pikyrent App,
- (iii) uses the full electric vehicles of the Pikyrent fleet

Pikyrent services are not intended for children under the age of eighteen, therefore, Pikyrent will not knowingly collect data relating to children.



Pikyrent keeps the Privacy Policy regularly updated and therefore invites the User to consult it regularly via the Pikyrent App or Website.

It is important that the User's personal data held by Pikyrent is accurate and up-to-date. Pikyrent advises the User to inform it, should the User's personal data change during their relationship with Pikyrent.

2. Purpose of the processing of personal data by Pikyrent

The User's personal data are processed by Pikyrent for the following purposes:

- Allow the User to access and use the services provided by Pikyrent;
- Provide the User with the information and services requested in the App and on the Pikyrent website;
- Allow the User to subscribe to the Pikyrent service and use the relevant App;
- In order to start and end the individual rental of vehicle as specified in art. 3 of the General Conditions of Contract;
- In order to provide assistance to the User by replying by email or telephone in the event that the User contacts Pikyrent customer service;
- In the event of an emergency (accident, theft) or a serious breach of the General Conditions of Contract;
- To ensure compliance with the legal obligations to which Pikyrent is subject;
- To ensure compliance with the obligations imposed by the Public Authority;
- For sending commercial communications in the event that the User has given their consent to this type of processing;
- For the pursuit of Pikyrent's legitimate interests such as, for example, the optimised and technically error-free provision of the *Mobility Sharing* Service.
- For marketing and communication activities
- For statistical purposes
- For carrying out the selection process with regard to the submission of CVs in the "Work with us" section and the conduct of selection procedures by telephone, video call or face-to-face interviews.



3. Legal basis for the data processing

The personal data processed by Pikyrent have been provided by the User.

In fact, some personal data can only be processed with the user's consent in accordance with Article 6, paragraph 1, lett. a) GDPR. You can withdraw your consent at any time in the future, by requesting the same at the following email address compliance@pikyrent.com

Pikyrent processes the personal data it needs to fulfil or enter into the User Agreement or to perform pre-contractual measures on the basis of Article 6 (1) (b) GDPR.

Other personal data will be processed in accordance with Article 6 (1) (f) GDPR for the pursuit of Pikyrent's legitimate interests, e.g. for the optimised and technically error-free provision of the *mobility sharing* Service.

In addition, it may be necessary to process personal data in order to fulfil a legal obligation to which Pikyrent is subject (Article 6 (1) (c) GDPR or for the protection of the fundamental interests of the User (Article 6 (1) (d) GDPR).

4. Data retention

Pikyrent will retain the User's personal data only for as long as is reasonably necessary to fulfil the purposes for which it was collected, including in order to fulfil any legal, regulatory, tax, accounting or reporting requirements.

Pikyrent may retain the User's personal data for a longer period in the event of a complaint or if it reasonably believes that there is a possibility of litigation in relation to the relationship between Pikyrent and the User. To determine the appropriate retention period for personal data, Pikyrent considers the amount, nature and sensitivity of the personal data, the potential risk of damages arising from the unauthorised use or disclosure of the User's personal data, the purposes for which Pikyrent processes the User's personal data and whether it can achieve these purposes through other means, and the applicable legal, regulatory, tax, accounting or other provisions.

In any case, it may occur that the European or national legislator imposes a longer retention period. In such cases, the data will not be erased or blocked until the corresponding retention period has expired.



After this period, the data will be permanently deleted.

5. User data processed by Pikyrent

Downloading and Installing the App

When the User downloads the App for installation, Pikyrent requests consent for the use of the interfaces to access functions and contents of the User's device in order to collect certain data, including:

- location: access to the exact GPS and network-based position (latitude, longitude, date and time), access to the approximate network-based position with reference to positions during the rental of the vehicle and to the user's position at the time of unlocking the vehicle;
- camera: photos and videos,
- information about the network connection;

Since the acquisition and processing of such data by Pikyrent is necessary for Pikyrent to fulfil the Contract with the User, the legal basis is represented by Article 6, paragraph 1, letter b) GDPR ("*The processing is only lawful if and to the extent that... it is necessary for the execution of a contract to which the interested party is a party or for the execution of pre-contractual measures adopted at the request of the same*").

Access to the interfaces indicated above is necessary in order to provide the User with the functions and services of the Pikyrent App. For example, the User's location is required to signal the nearest available vehicle and provide guidance on the exact location of the same vehicle. In addition, if the User activates vehicle rental, Pikyrent tracks the User's position when they lock and unlock the vehicle locking system. In this case, the tracking of the position takes place solely in order to ensure the regularity of the loan and return operation and to support the User in case they need assistance.

Subscription to the Pikyrent service via App

In order to use the service, the User is required to carry out the registration procedure for the service through the Pikyrent App.

The User registers through the App and enters – if required by the applicable privacy legislation and for compliance with the obligations imposed by the Public Authority – the following:

i. Identification and contact details:

- first name and surname,



- username and password,
 - birth date and place
 - tax ID code and/or VAT number,
 - gender,
 - driving licence data (licence number, type, issue data and expiry date) as an essential condition for using the service,
 - email address,
 - telephone number;
- ii. **Financial and transactional data**, which includes the number of the credit or prepaid card entered by the User, the holder, the expiration date and CVC of the aforementioned card, the country of origin of the holder and the information relating to all transactions carried out by the individual User (which concern rentals, subscriptions, transfers and chargebacks and any penalties). Please note that Pikyrent does not store the User's payment card data. This information is instead stored by a trusted third-party payment processor.
- iii. **Profiling data** including:
- the sex and age of the User;
 - the geographical areas affected by the use of vehicles:
 - Location of the last use of the App by the User with the related time reference,
 - Geographical location of opening and closing of rentals;
 - Usage feedback and responses to any surveys.

There are two legal bases for the processing of such data. The first is represented by Article 6 paragraph 1(c) as the processing is necessary to fulfil a legal obligation to which Pikyrent is subject as Data Controller. In fact, the purpose of the processing of this data is to allow Pikyrent to verify that the User meets the legal requirements to use the *mobility sharing* service (having reached the age of majority and possessing a licence suitable for driving the vehicle).

The second legal basis for the processing of such data is that provided for in Article 6 (1) (b) GDPR relating to the conclusion and execution of a contract. The aforementioned data are also processed in



order to guarantee the functionality of the App to the User. Without registration as a User through the procedure described in art. 2 of the Management Regulations, it is not possible to rent or use Pikyrent vehicles through the App.

With the uninstallation of the Pikyrent App and the expiration of the statutory retention periods, the data entered during registration will be deleted.

Using the App

Whenever the User uses the App on their device, Pikyrent collects the so-called server log files. These data keep track of all requests and all User accesses to the App and logs all error messages from an application. They include the following Technical and Usage Data:

- Identifier of the device used by the User,
- Operating system and version of the aforementioned device,
- Name of the manufacturer and version of the device,
- GPS signal quality and telephone network,
- Instant GPS position when opening the App and connection IP address,
- In the event of rental, the data collected by Pikyrent include GPS location history and the telephone and vehicle speeds.

The legal basis for the processing of the aforementioned data is Article 6, paragraph 1, letter f) GDPR. Indeed, Pikyrent has a legitimate interest in data retention since it needs it to detect and eliminate errors in the App, determine its use or make improvements and optimise its services.

The data will be deleted when the User closes the Pikyrent App.

Pikyrent may also collect **aggregate data** such as the total amount spent by Users, the number of rentals made, from the date of the last rental made and the number of subscriptions signed. Data aggregation is the process of collecting data and presenting it in a summary format. Data can be collected from multiple data sources in view of combining them for data analysis. These aggregated data may be used for the purpose of making offers to the User that are more in line with their specific use pattern of the Service.

The aggregated data may be derived from personal data provided by the User, but are not considered personal data under the law as they do not reveal – either directly or indirectly – the identity of the User.



For example, Pikyrent may aggregate the technical and usage data of Users to calculate the percentage of users accessing a specific function of the App, or to understand for how long and where vehicles are most used. Since these data are not governed by law, their processing is not subject to this Privacy Policy.

Using the Pikyrent Website

While browsing the Pikyrent Website, the following information may be collected and stored in the site's server log files (hosting):

- *internet protocol address* (IP);
- browser type;
- settings of the device used to connect to the site;
- *internet service provider* (ISP) name;
- visit date and time;
- data retention period.

The legal basis for the processing is Article 6, paragraph 1, letter f) GDPR. Usually, the manager of a website has a legitimate interest in data retention since they need it to detect and eliminate website errors, determine their use or make improvements and optimise the services offered.

The purpose of this type of data processing derives, therefore, from the legitimate interest of Pikyrent mentioned above: to detect and eliminate errors on the website in order to determine its use or make improvements.

The data collected by the Website during its functioning are stored for the length of time strictly necessary to perform the specified activities.

Upon expiry, the data will be deleted or anonymised, unless there are other purposes provided for and/or required by law for the storage of the same.

Data (IP address) used for site security purposes (to block attempts to damage the site) are stored for 30 days.

Applying to the "Work with us" section

By applying to the "Work with us" section, the following personal data may be collected

- first name;



- surname;
- city;
- address;
- main telephone;
- date of birth;
- residence;
- e-mail;
- all personal data contained in the curriculum vitae uploaded on the platform.

The legal basis for the processing of the aforementioned data is Article 6(1)(f) GDPR.

Upon expiry, the data will be deleted or anonymised, unless there are further purposes provided for and/or required by law for their storage.

6. If the User fails to provide personal data

Where Pikyrent needs to collect personal data pursuant to the General Conditions of Contract and the Management Regulations and the User does not provide such data when requested, Pikyrent may not be able to allow the User to use the App and, therefore, to execute the contract as stipulated.

7. Disclosure of the User's personal data

Affiliated Companies

Pikyrent will share the User's personal data within the same company, or by Pikyrent personnel as authorised parties. The User's personal data are processed by the Data Controller exclusively within the territory of the European Union.

Pikyrent may also share the User's personal data with parent companies, subsidiaries or affiliates (hereinafter, "Affiliated Companies"). Affiliated Companies may use the User's personal data, without prejudice to the possibility for the User to deny their consent to the use of personal data.

Third party companies

Pikyrent may disclose the User's personal data – only when necessary for the provision of the service – to its professional consultants or to companies that provide services and are appointed by Pikyrent (for



example, payment service providers, may have access to the User's personal data limited to the time and purposes strictly necessary for the provision of the service).

The external companies, unless otherwise specified, process the data on behalf of Pikyrent as Data Processors.

In addition, Pikyrent may share User data with insurers and brokers where this is necessary for the management of a claim, for the verification of the User's identity and for the verification of the use of the Pikyrent Service.

Local Authorities and Law Enforcement

The Local Authorities require Pikyrent to share some information about its vehicles as a precondition to allow Pikyrent to operate on the municipal territory governed by said Local Authorities. All Local Authorities ensure compliance with the GDPR and are required not to combine vehicle information with other information potentially able to identify the User. The authorities shall use vehicle information for urban planning, public engagement and compliance purposes.

Pikyrent may disclose the User's personal information to legal or regulatory authorities or law enforcement agencies in connection with proceedings or investigations, if it is obliged to do so.

8. Cookies

Cookies are used on the Pikyrent website, i.e. small text files that are saved on the User's computer and that store certain settings and data for sharing with the Pikyrent system through the User's browser.

For more information on the use of cookies by the Pikyrent website, please refer to the corresponding Cookie Policy, available on the Pikyrent website.

9. Data security

The Pikyrent website and App and other systems are protected by the adoption of technical and organisational measures against loss, destruction, access, modification or disclosure of data by unauthorised persons. To this end, Pikyrent has put in place adequate security measures to address any suspected personal data breaches and will report the breaches to the User and any applicable regulatory authority, when legally required to do so.

In addition, Pikyrent restricts access to the User's personal data to those employees, agents, contractors and other third parties who need to have knowledge of it for business purposes. These will only process



the User's personal data according to the instructions provided by Pikyrent and are subject to a duty of confidentiality.

10. The rights granted to the User

Pikyrent undertakes to respect the rights that the GDPR grants to data subjects with regard to the processing of personal data. If the User sends a request regarding the exercise of their rights under the Privacy Policy, Pikyrent will respond within 30 days from the day of receipt of the same and, where possible, will attempt to satisfy the User's request within this timeframe. If necessary, this period may be extended by a further 60 days in complex cases.

The User can contact Pikyrent customer service or the DPO at the following addresses compliance@pikyrent.com to exercise their rights in their capacity as a Data Subject of the processing of personal data by Pikyrent:

- i. Right to information (what are the data held by Pikyrent);
- ii. Right of access (to such data);
- iii. Right to rectification;
- iv. Right of cancellation;
- v. Right to restriction of processing;
- vi. Right to data portability;
- vii. Right of opposition;
- viii. Right to lodge a complaint with the national data protection authority.

For more detailed information on the rights granted to the Data Subjects of the processing of personal data, you can visit the website of the data protection authority in Italy:

Italian Data Protection Authority: www.garanteprivacy.it/home/diritti.