PRIVACY POLICY

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

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

Who is the Free2move Group ("Controller") & what do we do?

The Free2move Group ("Free2move", "us", "we", "F2m") is a mobility provider - we offer several services linked to carsharing, car rental (Car-on-demand), fleet management and parking via both our App and our Websites.

Free2move is a group of companies, including two main entities: Free2move SAS (located in France), and Free2move Germany GmbH (located in Germany). These two main entities jointly decide why, and how your data is processed by us (e.g., via our Apps, and the services we offer). For this reason, they act as Joint Controllers (as per. Art. 26 GDPR) and are both responsible to you under the law. Please read the sections below carefully for more information.

Free2move is part of the Stellantis Group.

Where is the information relevant for you?

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

- You rent our cars for a short period: **Carsharing** (p.3),
- You have a subscription or rent our cars for a longer period: **Car-on-demand** & **Rent** (p.11),

- You are one of our partners and use our services to operate your fleet: **SaaS**, **Connect fleet** (p.17),
- You have purchased a Stellantis car including **Preventive maintenance** (p.18),
- You use our **Parking** services (p.22),
- You want to **apply for a job** within the Free2move Group (p.25),
- You are a **website visitor** (p.27).

How to reach us for questions?

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

Free2move DPO,

privacy@free2move.com

45 Rue Chaussée d'Antin,

75009 Paris

France

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Carsharing (via our App)

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

Which of your data do we process, and why?

Downloading and using our apps

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

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

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

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

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

- Where relevant, the unique number of your device (IMEI = International Mobile Equipment Identity), the unique number of the network subscriber (IMSI = International Mobile Subscriber Identity).

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

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

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

In-App Cookies and similar technologies

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

Further information about cookies and the option to revoke your consent can be found in your app (via *Impressum & Privacy -> Privacy settings*). You can clear and delete cookies at any time via the corresponding settings of your browser/device.

We manage consents via our consent management tool Usercentrics.

App permissions

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

- Location / GPS data (required to allow us to disclose to you our nearby vehicles as soon as you open and are logged into our App). Please note that without this functionality being turned on and the subsequent processing of your location, we are not able to disclose our available cars next to you, a price estimation (as our prices may vary from country to country) nor to provide you with our services.

- Notifications (to allow us to send you push notifications about available rentals or events via our Radar),

- Bluetooth (must be activated to open or lock our vehicles).

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

Account creation

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

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

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

Additionally, we will process the following information related to the device used to submit an account creation request:

- IP of the end device (which allows us to estimate the country in which the request was submitted and in case no technical means preventing us to retrieve this information are used, such as a VPN for example),

- Device ID (a unique identifier attributable to a single Device, which is considered personal information). .

We log these information for security purposes, to prevent identity theft and fraud as well as to secure access to our platforms. We keep this information until closure of your Free2move account, except in cases where a security event is flagged - in such cases, we retain the relevant information for a longer period which may last up to 10 years, depending on the nature and security concerns related to the specific incident.

Verifying your Driver's License

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

- the biometric data entailed in your driving licenses via photographs (front and back) and a verification portrait picture ("selfie")

to verify its authenticity and your identity. To assist us in this process, and only in specific countries, we have chosen to engage with the following service providers, bound by the requirements applicable to data processors under Art. 28 GDPR: Jumio and Onfido (privacy policy). In some cases, our employees are conducting these validations manually .

Please note that in some cases, several individuals may be visible on the verification selfies. This may happen because the individual taking the verification selfie includes another person in the frame (e.g., in the background or close nearby) of the picture taken in this context. Free2move has no control over this, and will retain the picture used for verification purposes.

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

Renting one of our Car (Rental agreement)

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

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

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

Termination of individual rentals and verification pictures (Face blurring and damage detection via Artificial Intelligence systems)

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

- if you are located within our authorized area to finalize the return of our car (which includes the processing of your geolocation data for verification purposes),
- if you have exceeded the permissible rental period, and
- the mileage and tank or load level of the rented Free2move car

for invoicing purposes, as well as to enforce our Terms and Conditions.

Additionally, to assess if any damages have been caused to our cars during individual rentals and to be able to attribute them correctly, we kindly require our customers to take

- four (4) verification pictures of the cars (to be taken under different angles), at the start of each rental.

These pictures help us to assess (i) if a potential damage may have been caused to one of our vehicles, (ii) during which individual rental, and (iIi) which damage / kinds of damages may have been caused, as we may be required to inspect and fix the car immediately (in line with our Terms and conditions and our legal obligations) to ensure road safety and the security of our customers in some cases. In some cases, we may require our service providers responsible for cleaning and maintenance of our fleet to take these pictures instead.

Artificial intelligence (face blurring / anonymisation and damage detection)

Because we do not store personal data beyond what is strictly necessary to ensure the purposes mentioned above, we have chosen to use the services of our service provider CarValoo (part of the INVERS Group) to ensure all pictures taken by our customers before their rental are anonymised before their submission for a semi-automated assessment for damage detection. In this context, Carvaloo uses artificial intelligence models - please find more information on the technologies used in this context below.

1. **Anonymisation of the pictures:** before storing any pictures and to ensure we only process the minimum information which is strictly necessary to achieve our aforementioned purpose, we are using systems which involve Artificial intelligence

to anonymise these via face blurring technologies (so called "Gaussian Blurring"). The model used in this context (a CNN, Convolutional Neural Network- YOLO object recognition) was trained using publicly available information in order to recognise potential faces on pictures and blur/anonymise these before their storage on a Free2move dedicated and segregated server (Microsoft azure). In any case, such pictures are systematically deleted from CarValoo's systems after a period of 90 days.

Please note CarValoo never knows which customer is taking the pictures- only Free2move has the information necessary to identify when and by whom the pictures have been taken, and this link will only be made in case of identified damages. Where this is the case (see point "damage detection" below) and these may be relevant in the context of a legal proceeding or the enforcement of our rights and/or our terms and conditions, then Free2move will store these on its own servers for the length of our retention period, in line with our contractual and legal obligations.

2. **Damage detection:** to make a preliminary assessment for potential damages on one of the pictures, we have chosen to engage with another functionality offered by our service provider CarValoo (part of the INVERS Group). In this context, the anonymised pictures are first analysed by another algorithm (provided by Bdeo) for damage detection, and secondly, additional filters are applied as jointly defined by CarValoo and Free2move, in order to reduce potential false values. Where a potential damage was identified on the car, we compare the pictures with the ones taken in previous rentals in order to identify during which the damage has been caused and attribute it correctly.

   We do not subject any of our customers to an automated decision making - please note this process is never fully automated, and any potential findings flagged by the AI powered systems are systematically reviewed manually via one of our employees (to ensure a human review in any case).

Accident, emergencies and serious violations of our T&C's (including smoke detection)

In the event of an accident involving one of our vehicles, we will process your personal data in accordance with the remaining provisions of this Privacy Policy, legal requirements and to comply with our Terms and Conditions. We are entitled to disclose the relevant information to third parties, including insurance companies, law enforcement authorities and/or in connection with the assessment, establishment or defence of legitimate claims. This will be done in accordance with our Terms and Conditions and our legal requirements.

If we have clear indications or evidence of an (imminent) emergency in relation to a natural person or a vehicle (including theft, vandalism or destruction of our vehicle, or if it leaves our authorised business area), we are entitled to process the following additional information in real time:

- Your location, contact details and telematics data

to locate our vehicle, prevent its loss, potential accidents or emergencies, and/or to contact you.

We reserve the right to process additional information depending on the nature, severity and urgency of the situation. This is done in order to determine serious violations of our T&Cs or applicable law, to process the accident claim internally and/or externally and to determine and/or enforce any claims. The basis for this is the execution of our contract, in accordance with applicable laws and in our legitimate interests, as well as the legitimate interests of our guests. If an accident has occurred, we will store this data in accordance with the regular legal retention period for a period of up to 3 years after the end of the year in which the event occurred.

Smoke detection

Free2move is committed to provide smoke-free cars to its customers, as found in our Terms and Conditions. To help us assess when a smoking event has taken place and identify when a breach of our T&C's has taken place, we have chosen, in collaboration with our partner Invers, to equip some of our vehicles with smoke detectors. These detectors are located within our vehicles and process the following information:

- the number of particle concentration in the air and in the car during individual rentals.

The data is collected via an end device provided by Invers. If a smoke event is recorded by Invers, it is stored for a maximum period of 90 days on their servers. Invers only knows that a smoke event has taken place in a specific car, but are never able to identify the customer present in the car at the time of the event, nor who rented the car. If a smoking event is recorded during an ongoing rent, the event is submitted for review by a Free2move employee. Where such an event is confirmed, which constitutes evidence of a breach of our terms and conditions, Free2move reserves the right to attribute the smoke event to the individual rent during which it has taken place, in order to charge the customer responsible for this breach of our terms. We do so based on our contractual rights, as well as in the interest of our customers and their health, to ensure a smoke free environment for all of our customers.

Geolocation

You can see our cars located close to you and reserve a car via our apps for a certain period of time. For this purpose, we may process

- your location, to display our available cars located close to you,
- your location at the beginning of the rent, to show you which available car near you can be rented as well as for invoicing purposes,
- your location at the end of the rent, to verify that our car is parked in our permitted area,
- the location of our vehicle during interim interruptions to the journey, in order to analyse and optimise the use of the vehicle fleet. The processed data is purely vehicle-related data that does not allow any personal reference.

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

Telematic and Driving Behaviour Data

Telematic Data

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

- status of the locking system (including closed or open windows),
- speed and immobiliser,
- mileage counter,
- voltage detection of the on-board electrical system,
- tyre pressure,
- tank capacity,
- safety systems (e.g., airbags),
- key holder,
- fuel card (if relevant),
- Data related to abnormal acceleration patterns and potential collisions, including impact severity indicators, and other technical telemetry, and
- location data (at the beginning and end of the rental period, in the event of emergencies, and/or in the context of determining the occurrence of an incident and damage).

This is done for the purpose of providing safe vehicles, detect, verify and document potential incidents or damages, coordinate operational responses (e.g., inspections, repairs, or follow-up actions) as well as the fulfilment of our contractual obligations.

Depending on the car, this information is either collected by systems integrated within the cars by the respective car manufacturer (see "Connected Car Services" section below), and/or via telematic boxes provided by our partners carValoo and INVERS, both part of Fleet Technology.

Driving Behaviour Data

We also collect data related to vehicle use and driving behaviour, including information about harsh braking, sudden changes in direction (joyriding), sudden acceleration, fast cornering, or potential collision events, as well as recurring speed limit violations. These events are detected through threshold-based triggers configured within the telematic systems embedded in the vehicles of our fleet..

Where such events occur, we may record the timestamp of the event, the nature of the warning (e.g. hard braking, sharp acceleration, excessive turning, or potential accident), and sensor data such as brake pedal position, gas pedal position, longitudinal or transverse acceleration, steering wheel angle, and the vehicle's location at the time of the event.

Speeding events are assessed by comparing the current vehicle speed to the applicable speed limit on the road segment, approximately every 100 metres. Where the configured speed threshold (e.g., 30 km/h above the permitted limit) is exceeded, we record the timestamp, actual speed, applicable speed limit, and the relevant road segment travelled.

These data are linked to the specific trip and customer account and may be processed in conjunction with the data mentioned in the Telematic Data Section above to assess your behavior at trip level.

This assessment aggregates data from individual events to produce trip points, reflecting the frequency, severity, duration, and type of driving behaviours. These points are assigned to defined categories and can be normalised per kilometre to allow comparative assessment.

In addition, we process this data to improve fleet usage, reduce vehicle misuse, promote responsible driving, notify users in the event of risky behaviour. Certain forms of profiling

may be used to carry out automated decision-making processes that may influence your experience within our apps. For example, such decisions could result in adjusting the features available to you, personalising in-app content, or assessing your eligibility for certain services, based on how you interact with the app or use our vehicles.Where such decisions are likely to produce legal or similarly significant effects, they are strictly governed by the contractual framework set out in our General Terms and Conditions. In particular, this data may also be used for example to determine whether a user may be temporarily restricted from booking new trips, temporarily or permanently suspend your account, or to apply contractual penalties associated with inappropriate or dangerous vehicle use. It may also impact the amount of the applicable security deposit, particularly where repeated high-risk behaviour is observed.

Conversely, consistently safe and responsible driving may result in positive outcomes, such as for example lower reduced fees, reduced security deposits, discounts or access to promotional benefits.

We process this data based on our legitimate interest (Article 6(1)(f) GDPR) in ensuring the security and proper use of our vehicles, detecting misuse, and encouraging safe driving practices.

Where the processing involves profiling or behavioural analysis without producing legal or similarly significant effects for the user, this legitimate interest remains the applicable legal basis.

However, where the processing results in significant consequences for the user, such as financial penalties or restrictions on the ability to book vehicles, and is based solely on automated decision-making, Article 22 GDPR applies. In such cases, the processing will rely on the necessity for the performance of the rental agreement, provided that the relevant consequences are clearly defined in our General Terms and Conditions (Article 6(1)(b) GDPR, in conjunction with Article 22(2)(a)).

In accordance with Article 22(3) GDPR, we implement appropriate safeguards, including the right to obtain human intervention, to express your point of view, and to contest the decision.

You also have the right to object to processing based on legitimate interest at any time (Article 21 GDPR). Where you exercise this right, we will no longer process your personal

data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or where the data are necessary for the establishment, exercise or defence of legal claims.

Connected Car Services

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

Digital refueling

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

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

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

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

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

Push messages & in-app notifications

Push notifications: Our app notifies you via push messages on your device. These notifications are sent to let you know when vehicles are available in the area you have selected ("radar" functionality) or to provide updates on your current rental. In such cases, push notifications are sent as part of pre-contractual measures or to fulfil the contract.

You will also receive push messages and in-app notifications to keep you informed about our latest and local offers - here we rely on both your consent and our legitimate interest.

Push notifications and in-app notifications can be activated/deactivated at any time as follows:

- Android: Settings -> Apps -> Free2move App -> Notifications -> "Block all";
- iOS: Settings -> Notifications -> Free2move app -> Allow notifications -> Off.

To display push notifications, we use Google Firebase (for Android) and Apple Push (for iOS) - for this purpose, the data transmitted is pseudonymised.

Carsharing with FREE NOW

Free2move works with FREE NOW to offer and rent out our car sharing vehicles via the FREE NOW passenger app. In doing so, FREE NOW and the Free2move Group act as joint controllers within the meaning of Art. 26 GDPR for the processing of your personal data, including

- User data (first and last name, user and passenger ID, email address, driving licence data, validation images, GPS location data)
- Vehicle and trip data (vehicle ID, minutes used, distance, costs, start and end position of the rental, time of booking, price paid, error codes and messages, reservation and vehicle status)
- Device and usage data (device ID, IP address, country + country code, app version, payment data),
- If necessary, further data may be shared with FREE NOW in the context of fraud prevention (in the event of any existing Account suspensions, terms and conditions and/or legal violations, missing verifications, etc.).

The basis for the processing of your data is the conclusion and execution of the rental agreement - this includes, among other things, the processing of customer enquiries and complaints, invoicing, the processing of insurance or police enquiries and the handling of accidents. Your data will be deleted as soon as it is no longer required for the fulfilment of the contract, taking into account any statutory retention periods (in particular tax and commercial law regulations).

You can exercise your rights as a data subject (pursuant to Art. 15 to 22 GDPR, see section "Your individual rights" below) against each individual controller at any time.

Carsharing via HVV Switch (Hamburger Hochbahn AG)

Free2move works with the Hamburger Hochbahn AG to offer and rent out our car sharing vehicles via the mobility platform “HVV Switch”. In doing so, the Hamburger Hochbahn AG and the Free2move Group act as joint controllers within the meaning of Art. 26 GDPR for the processing of your personal data, including:

- Activation data and status (first and last name, initials, e-mail address, telephone number, address, driving licence data, date and place of birth),

- Requested reservation/cancellation (vehicle (type), rental start and end - incl. timestamp and location, timestamp of booking request)
- Booking and invoice data (incl. start and destination, time, price),
- If necessary, further data may be shared with the Hamburger Hochbahn AG in the context of fraud prevention (in the event of any existing Account suspensions, terms and conditions and/or legal violations, missing verifications, etc.).

The basis for the processing of your data is the conclusion and execution of the rental agreement - this includes, among other things, the processing of customer enquiries and complaints, invoicing, the processing of insurance or police enquiries and the handling of accidents. Your data will be deleted as soon as it is no longer required for the fulfilment of the contract, taking into account any statutory retention periods (in particular tax and commercial law regulations).

You can exercise your rights as a data subject (pursuant to Art. 15 to 22 GDPR, see section "Your individual rights" below) against each individual controller at any time.

How long do we keep your information?

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

Do we share your information?

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

Law enforcement

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

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

upon request of the local law enforcement agency, including local authorities responsible for traffic offenses, courts, local administrations, or police authorities, in line with our legal

obligations. In the event of a breach of our Terms and Conditions, we reserve the right to share the relevant information required to establish, exercise, or defend our legal rights with authorities, external consultants or authorized third parties.

Our Group Companies/ Merger or acquisition

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

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

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

Our Business partners and Service Providers

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

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

Payment & Claims management

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

- Adyen (Privacy Policy),
- Paypal for Paypal transfers(Privacy Policy),
- Stripe (Privacy Policy).

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

In the case of payment by credit card, data is transmitted to the payment service provider Stripe Inc (510 Townsend Street, San Francisco, CA 94103, USA). In addition, we use the

services of Stripe to detect fraudulent behaviour at an early stage by calculating a so-called risk score based on the data described.

In the event of outstanding claims or payment default, we may rely on third parties for claims management, including our service provider GFKL PayProject, part of the Loweel Group. This may require us to forward the requirement information for the enforcement of these claims. This is done based on our contractual obligations and in the context of fraud prevention.

Customer service

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

We use CRM management tools: Salesforce Cloud Marketing and Braze.

Car rental ("Car-on-demand")

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

Which of your data do we process, and why?

Closing a subscription and verifying your eligibility

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

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

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

Delivering our services to you

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

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

Geolocation

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

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

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

Telematic Data

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

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

This is done for the purpose of providing safe vehicles and the fulfillment of our contractual obligations. Depending on the car, this information may either be collected via systems integrated within the cars by the respective car manufacturer (see *"Connected Car Services"* section below), and/or via telematic boxes provided by the Free2move Group (via our affiliate company, Kuantic).

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

Connected Car Services

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

Accident, emergencies and serious violations of our T&C's

In the event of an accident involving one of our vehicles, we will process your personal data in accordance with the remaining provisions of this Privacy Policy, legal requirements and to comply with our Terms and Conditions. We are entitled to disclose the relevant information to third parties, including insurance companies, law enforcement authorities and/or in connection with the assessment, establishment or defence of legitimate claims. This will be done in accordance with our Terms and Conditions and our legal requirements.

If we have clear indications or evidence of an (imminent) emergency in relation to a natural person or a vehicle (including theft, vandalism or destruction of our vehicle, or if it leaves our authorised business area), we are entitled to process the following additional information in real time:

- Your location, contact details and telematics data (insofar as possible)

to locate our vehicle, prevent its loss or accident, and/or to contact you.

We reserve the right to process additional information depending on the nature, severity and urgency of the situation. This is done in order to determine serious violations of our T&Cs or applicable law, to process the accident claim internally and/or externally and to determine and/or enforce any claims. The basis for this is the execution of our contract, in accordance with applicable laws and in our legitimate interests, as well as the legitimate interests of our guests. If an accident has occurred, we will store this data in accordance with the regular legal retention period for a period of up to 3 years after the end of the year in which the event occurred.

Friend Referral Programs

If you use of one of our Friend Referral Programs, we collect and process data in line with the applicable Terms and conditions which are available for acceptance before submitting the referral. This is done based on your consent and our contractual obligations, for the purpose of providing the benefits of our Friend Referral Programs and processing your related queries. Please note that we have no means to ensure the referred individual has given their consent to be referred. They can request for their information to be deleted anytime via email to dataprotection@share-now.com .

Our business administration

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

How long do we keep your data?

Free2move only retains personal information as long as necessary and legally required. As long as our relationship is ongoing, we will keep your information in line with applicable laws. Our security logs, which contain telematics data and information collected to detect damage, are deleted after 90 days if no damage or violations of our terms and conditions have occurred.

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

Do we share your information?

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

Law enforcement

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

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

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

Our Group Companies/ Merger or acquisition

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

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

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

Our Business partners and Service Providers

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

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

Payment & Claims management

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

- For PayPal transfers: PayPal S.a.r.L et Cie, S.C.A (Privacy Policy), or
- Stripe (Privacy Policy), where relevant.

Insofar as other payment methods are permitted, the respective data protection conditions of our partners for the processing of personal data also apply. In the event of outstanding claims or payment default, we rely on third parties for claims management. In this context, some personal data may be forwarded to our partners for the purpose of enforcing our claims. This is done based on our contractual obligations and in the context of fraud prevention.

Customer service

You can submit a request to our customer service by email or telephone. We will process the personal information you provide us for the purpose of allocating, processing, and answering your request, in line with your consent and our contractual obligations. We may send surveys to assess your satisfaction with our services - in such cases, you consent to provide us with the data collected therein by entering it. You can revoke your consent at any time via the privacy settings available in your user profile in the Free2move apps, or by contacting our customer service.

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

Mobility Card

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

- your identification and contact information (e.g., names, email addresses and phone numbers),
- your login details,
- Usage data linked to the Mobility Card,
- Payment related information including for the purpose of invoicing or enforcing promotions.

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

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

Fleets management (SaaS): Connect Fleet, Preventive maintenance

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

Which of your data do we process, and why?

Connect Fleet

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

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

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

Fleet Management

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

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

This enables us to provide you and your employees with access to our platforms and apps, to monitor the needs of your fleet, and to reserve, lock or unlock your cars (by access card or smartphone) at any time. This is done in compliance with our contractual and legal obligations.

Preventive maintenance

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

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

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

Registration to the Free2move Platform

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

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

We process this information in accordance with our contractual obligations set out in the terms and conditions attached to your contract, which we invite you to consult for further information.

For more information on the processing of your data in connection with the provision of other Free2move Group services, please consult the relevant sections of this privacy policy.

How long do we keep your data?

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

Our business administration

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

How long do we keep your data?

We will store your data and the data of individual vehicles / the entire vehicle fleet in accordance with applicable law and the retention periods defined by you. Where no individual retention periods have been defined, your data will be stored for a maximum period of 4 years. This period corresponds to the duration of the Preventive Maintenance Service, which was included free of charge with the sale of the Stellantis car.

Taking into account our statutory retention obligations, we generally store geolocation data for a period of two months.

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

Your Rights

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

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

Do we share your information?

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

Mobilisights

To assist us in the performance of our services, our partner "Mobilisights" may receive some of your personal and car related information (including geolocation data collected directly via our cars). Mobilisights assist us by providing the technical environment required to display our fleet management platforms, and to enable the management of a fleet.

Kuantic

Kuantic is a brand of the Free2move Group and supports us in the provision of telematics boxes in some of our vehicles, as well as in the retrieval and processing of personal data (including geolocation data) collected via the hardware installed in the vehicles.

Law enforcement

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

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

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

Our Group Companies/ Merger or acquisition

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

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

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

Our Business partners and Service Providers

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

Payment & Claims management

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

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

Where other payment methods are authorised, the respective conditions of our partners apply in addition to our own and with regard to the processing of personal information.

In the event of outstanding claims or payment default, we rely on third parties for claims management. In the event of outstanding claims or late payment, we may contact third parties for claims management. To do so, we may have to pass on the information required to enforce our claims. This is done on the basis of our contractual obligations and in the context of fraud prevention.

Customer service

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

We use Odoo as a CRM-Management-Tool.

Park

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

Which of your data do we process, and why?

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

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

How long do we keep your data?

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

Do we share your information?

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

Law enforcement

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

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

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

Our Group Companies/ Merger or acquisition

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

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

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

Our Business partners and Service Providers

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

Payment & Claims management

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

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

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

Customer service

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

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

Your application for a Free2move position

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

Which of your data do we process, and why?

To consider if a profile could be a fitted candidate to one of our open positions, we may process information about your identity, your contact details, your qualifications, relevant skills and employment history, and information about your expected remuneration. This information is made available by you via the means of your choice (via online-applications, CV's, cover and reference letters) or is collected during the recruitment process (via interviews and/or tests). This information is processed based on your consent.

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

How long do we keep your data?

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

Do we share your information?

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

Our Group Companies/ Merger or acquisition

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

Law enforcement

If you committed a legal offense, Free2move may be required to share specific information related to this offense upon request of the local law enforcement agency. These can include the local authorities for local administrations, or police authorities. Please note that in such cases, we are legally required to comply with such requests and we reserve the right to share the relevant information required to establish, exercise, or defend our legal rights with authorities, external consultants or authorized third parties.

Our Business partners and Service Providers

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

Teamtailor

We have chosen to work with our service provider Teamtailor to help us manage our recruitment process across the Free2move Group. You can find more information on the processing of personal data by our partner via their privacy policy here: Teamtailor.

You are visiting a website from the Free2move Group

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

Which of your data do we process, and why?

Register as a User

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

Reserving a car

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

Adding a Driver

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

Getting in touch with you

We offer several possibilities to get in touch with us via contact forms embedded on our websites (via our contact form, or via our B2B services). Note that we will process the information you may enter there to process your request, to get in touch with you and to

provide you with an answer to your query. This information may include your full name, your contact details as well as your message to us and may be forwarded to our CRM, provided by our partner Braze (Privacy Policy) and Pipedrive (Privacy Policy). Please read their respective Privacy Policies for more information on their processing of personal data.

Provision of our Websites: Cookies and similar technologies

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

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

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

We are using Google Analytics for website statistics. For more information, please read Google's Privacy Policy.

How long do we keep your data?

Where we store your personal information based on your consent, you can revoke your consent anytime (by cleaning your cookies via your browser settings for example or requesting the deletion of your contact information previously entered by reaching out via privacy@free2move.com). As a rule of thumb, we recollect consent via our cookie banner every 6 months. Where we process your information based on our legitimate interest, it is deleted in line with applicable laws and our retention policy.

Do we share your information?

Our Free2move Group business partners

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

Our Service Providers

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

Law enforcement

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

Our Group Companies/ Merger or acquisition

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

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

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

Managing your satisfaction, Promotional Offers and Newsletter

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

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

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

We base these activities on both our legitimate interest and your consent, if you have granted us your approval. You can withdraw your consent at any time by unsubscribing via our unsubscribe link (included in our emails) or via your app under "Profile/Edit profile/Mailing & privacy settings" by activating/deactivating the checkboxes.

Rewards

As part of our Free2move Rewards programme, we offer our participating customers in some countries the opportunity to receive and collect points for vehicle rentals and to receive various rewards for this. For the purpose of providing the programme, we process your personal data, in particular:

- the customer ID and data relating to the vehicle rental.

We use the services of the external service provider Talon.One GmbH to customise certain conditions or features. Participation to the Free2move Rewards programme is voluntary. Our customers can take part in the programme and register for it at any time. The processing of personal data therefore serves the purpose of executing the contract with the participating customer.

Further information on the Free2move Rewards programme can be found here: https://app.int.free2move.com/de/en/free2move-rewards/ .

Fraud prevention

Account closure (Contractual or unlawful behaviour)

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

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

Please note that in such cases, we reserve the right to document the relevant circumstances, share information with the relevant third parties (including law enforcement) and implement corrective measures which can lead to the definitive closure of your account. We also conduct appropriate verifications during your registration (with sanctions lists) in line with legal requirements. For the avoidance of doubt, the reasons for the permanent or provisory lock of your account may be the following:

- suspected fraud or identity theft (where we are able to identify a fraudulent payment profile, because the payment details do not match the account owner, or because we have strong reasons to believe there may be a discrepancy between the registered account owner, the holder of the driving license and the payment owner)
- security locks (e.g., in case of a breach of our Terms and conditions affecting our ability to provide secured platforms, issues during the identity verification process, security concerns related to the customer data, device used or payment method)

legal offences (because we have found evidence of unlawful behaviours which may include driving under the influence of illegal / unallowed substances, fuel fraud, the use of our vehicles in the context of organised crime, drug selling; if illegal objects were found in the car such as drugs, weapons or else, or if our car has been stolen by an individual).

Fraud prevention during registration (keycloak)

In line with our legitimate interest and legal obligations, we carry out a risk assessment to prevent the creation of fraudulent accounts on our platforms and potential financial damage caused by unpaid invoices. These checks may be carried out when you first register, or each time you register a new payment method, and the following information may be processed automatically:

- Your full name and email address, your phone number, your device ID registered with us and your account details,
- a one-time authentication using a token (generated by the single sign-on solution "keycloak") to check your details once against our existing user directory.

If necessary, selected results are forwarded to our specialised department for manual verification. We base this on our contractual and legal obligations, as well as on our legitimate interest. Your data will be deleted immediately after the authentication and verification process.

Riskscore

In addition to the services provided by our service provider Stripe related to fraud prevention in the context of credit cards payments, we are documenting incidents related to your rentals and customer account which entail indicators of a potential lack of payment by processing the following information:

- Your contact details (address, full name, email address, phone number, language and country, Customer ID, registration date and time),
- Information related to the verification of your identity (Name, Biometric and personal data present on your ID and Driver License, Device ID, validation date and numbers of validation attempts, login attempts, password reset requests, failed log-in and password attempts),
- Information related to your payment details (name of the card owner, Bank, validity and last 4 Numbers of the card number, number of credit card added) and if you are paying with PayPal, your PayPal account(s) email address(es),
- Information related to your rental history (including the location and contracts related to your rentals),
- Technical information (Device ID, number of registered devices, operating system) related to the use of our applications and platforms (including our websites) in so far as these are relevant to show any risks,
- Information provided by third parties, namely from our service providers and/or law enforcement, courts and authorities as the result of investigation and/or open claims.

We may process this information as it entails indicators for fraud prevention and record it as indicators for potential security issues, with a corresponding “risk note” which correlates to the nature of the event. Where we have been able to detect several incidents / indicators for a potential fraud attempt (e.g., if the payment details are changed several times in a couple

of minutes, and/or the name of the card holder does not match the name of the driver, and/or you have several registered devices to log into our services), we will flag your account for a manual review by our employees. In case we determine that the recorded events show sufficient evidence linked to a fraud attempt, we may block your account or terminate it permanently. Where this is the case, we will notify you via email about the fact your account has been suspended. If you wish to contest / dispute our assessment and the presence of a fraud attempt, you can reach out anytime via our customer services and we shall be happy to provide you with assistance.

The Free2move group processes this information in the context of fraud prevention, in line with our legal and contractual rights and obligations as well as our legitimate interest. We never share this information externally and we will delete this information once your account has been closed (upon your request), in line with our legal retention obligations.

Transmission to third parties

We also transfer your personal customer data (name, address) to third parties where this is necessary to enable these to contact you and so that these third parties can assert claims directly against you in the event of claims against the Free2move Group that are not obviously unfounded, for example arising from parking offences in the private sector.

We also transfer your personal customer data (name, address, vehicle rental data if applicable) to authorities, courts and other public bodies, external consultants or other authorised third parties, insofar as this is permitted under the applicable law, e.g. if the processing is necessary to protect the legitimate interests of the Free2move Group. This may be the case, for example, if you commit an offence during a rental.

Do we share your information outside of the EEA?

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

Cross-country and cross-company use of Free2move services

The Free2move Group has companies and operates in the following countries: Germany, France, Italy, England, Spain, Austria, the Netherlands and North America. If you use or rent a vehicle outside of our national companies or partner companies (franchise partners), your data will be forwarded to the respective partner company for the purpose of contract fulfilment in order to facilitate the rental.

Service Provider

We have chosen to work with some third parties while delivering our services to you and in this context, some of your personal information may be processed. We have chosen partners in line with their commitment to privacy and security, documented by the

corresponding contractual safeguards (such as Standard Contractual Clauses, SCC's), the technical and organizational safeguards implemented and the documentation thereof. Please note that these safeguards are always assessed in line with the latest legal requirements.

How do we safeguard your data?

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

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

Your individual rights

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

- Request access to your personal information ("Right of Access", Article 15 GDPR),
- Ask for the rectification of your data if it's outdated or inaccurate (Article 16 GDPR)
- Submit a request for the deletion of your personal data ("Right to be forgotten", Article 17 GDPR)
- Restrict the processing of personal data (Article 18 GDPR);
- Object to the processing of your personal data (Article 21 GDPR);
- Request the portability of the data you have provided us (Article 20 GDPR);
- Withdraw your consent in line with applicable laws (Article 7 (3) GDPR);
- Lodge a complaint with your local supervisory authority for the protection of personal data (Article 77 GDPR).

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

Your rights are not absolute and may be subject to some restrictions. You may exercise these

- by e-mail via dataprotection@share-now.com (if you are a carsharing user) or via privacy@free2move.com (if you use any of our other services),
- or via your user setting available in our application.

Registration cancellation / Account deletion

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

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

Changes to this Privacy Policy

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