

Privacy policy

Version 1.0 of July 1, 2021

1. INFORMATION ABOUT DATA PROTECTION

VULOG LABS, 21 AVENUE SIMONE VEIL, 06200 NICE, (LEO&GO) provides all users of the LEO&GO mobile application ("application") with the following Privacy Policy to provide information on how we manage your personal data and protect your privacy. LEO&GO recommends that the user carefully reads its Privacy Policy.

LEO&GO thus commits to process your Personal Data in compliance with applicable laws and regulations and in particular Law n°78-17 of January 6, 1978, relating to information technology, files and freedoms, and Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of individuals concerning the processing of personal data and the free movement of such data.

2. INTRODUCTION

This Privacy Policy manages the treatment of personal data collected by LEO&GO through the application and/or in the course of providing the application services ("application services"), as described in the General Terms of Use.

The User warrants that the information provided is true, accurate, complete, and up to date and is liable for any direct or indirect loss or damage that may occur due to failure to comply with this obligation. When the user provides personal data about third parties, they guarantee that they have been informed of the contents of this Privacy Policy and that they have obtained their prior consent to provide us with their personal data to process them for the necessary purposes.

Concerning the personal data requested through the forms activated in the application, the user must provide at least those considered mandatory. Otherwise, LEO&GO will not be able to accept and manage the request.

LEO&GO may modify this Privacy Policy if necessary. If we change this policy, we will notify you through the application, our website, or other means of communication to ensure that you are aware of the new privacy terms applicable to the application's services. Suppose you continue to use the application services after informing you of the changes to our Privacy Policy. In that case, this will mean that you accept the new terms, except for those instances for which your explicit consent is required.

3. WHO CONTROLS THE DATA?

Name of the company: VULOG LABS, 21 AVENUE SIMONE VEIL, 06200 NICE, registered in the Trade and Companies Register of Nice, under the number 898 324 330.

Telephone number: 04 28 29 29 20 (7 days / 7, 24 / 24).

E-mail address: bonjour@leoandgo.com

4. TO WHAT EXTENT DO WE PROCESS YOUR PERSONAL DATA?

The personal data you provide us with may be processed by LEO&GO for any of the purposes below, depending on the type of data provided by the user, as well as the user's interactions with the application:

1. **Registration of the user in the application and management of the platform supporting the application:** the use of the application's services is dependent on the prior registration of the user in the application and, for certain functionalities, on the submission of the relevant documents, as well as on the acceptance of the Terms of Use of the application and the Privacy Policy.
2. **Application Management:** the application use may involve processing certain technical information about the users' mobile or another digital device to allow its operation and incident management.
3. **Customer Service:** LEO&GO provides users a customer service center regarding the use of the application's services.
4. **Fraud prevention:** management and development of fraud prevention and control operations.
5. **Promotion management:** Promotion management and user participation and the provision of information on promotional activity to users and complies with LEO&GO's legal obligations due to promotions.
6. **Preventing or identifying road accidents or driving offense:** analysing driving behaviour and speed, accident or impact detection, and warning to LEO&GO and to the User in case of inappropriate driving.
7. **Data Anonymization:** LEO&GO may anonymize users' personal data to comply with legal obligations regarding security measures and prepare reports regarding the operation of the car-sharing service, market research, and profitability studies based on anonymized data to increase knowledge about the use of LEO&GO's services and to improve the application's services.
8. **Data Analysis (from internal and external sources):** LEO&GO may conduct activity analysis and user profiling using internal and external data to improve the quality of the application services, including the development of predictive and mobility models.
9. **Collection of information:** conducting surveys, satisfaction surveys, studies, or statistics to evaluate the quality of its service better and anticipate the needs of its customers as part of LEO&GO's legitimate interest in ensuring customer satisfaction and consistent monitoring.

10. **Marketing Communications:** LEO&GO may send communications to users to promote the application's use and share content related to the application's services.
11. **Third-Party Marketing Communications:** LEO&GO may send marketing messages to promote third-party products and/or services.
12. **Internal Source Profiling:** To provide personalized marketing communications tailored to users' needs, preferences, and personal circumstances, LEO&GO may collect information about a user's use of its application services solely from internal data and analyze the user's characteristics or behavioral patterns to place them in a specific category or group, and/or to make predictions or assessments about them. Internal data profiling can include operations to enable the provision of application services and to improve the quality of those services.
13. **Geolocation:** To provide application services and facilitate the provision of car-sharing services, LEO&GO may require users' geolocation data.
14. **Compliance with legal obligations relevant to LEO&GO and related to the application's services:** in keeping with LEO&GO's legal responsibilities in adherence to the application's services that require the use of user data.

5. COOKIES

What is a cookie?

A cookie is a small text file sent to your browser by the website you visit and stored on your terminal equipment. Cookies allow the website to collect information regarding your visits, such as your site navigation or your language preference, to improve your browsing experience and the content and functionality of the website.

What cookies are present on the website?

- Functional cookies: You are informed that during your website visits, LEO&GO may install technical cookies on your terminal, allowing it to track your navigation without requesting authentication on each page. These cookies are automatically deleted from the browser when you close it.
- Audience measurement cookies: LEO&GO uses Google Analytics, a statistical tool that may place cookies on your terminal to produce statistics relating to the number of visits, the number of pages viewed, the activity of users of the website, and the frequency of their return. We inform you that all data collected through the use of these cookies are used anonymously by LEO&GO to improve the website's quality.

How can I disable cookies?

You have the possibility of refusing cookies on your terminal via your browser software.

Depending on the browser used, you have the possibility of :

- Listing the cookies used for each site;
- Deleting the cookies;
- Refusing new cookies;

LEO&GO informing you that functional cookies are necessary for the proper functioning of the website.

Deactivating cookies on the Internet Explorer browser: <https://support.microsoft.com/fr-en/help/17442/windows-internet-explorer-deletemanage-cookies>

Disabling cookies on the Firefox browser: <https://support.mozilla.org/fr/kb/activer-desactiver-cookies>

Disabling cookies on the Google Chrome browser: <https://support.google.com/chrome/answer/95647?hl=fr>.

Note that Google provides a tool that allows you to specifically refuse the cookies used by its Google Analytics solution. This tool is available at the following address: <https://support.google.com/chrome/answer/95647?hl=fr>.

6. HOW DOES LEO&GO OBTAIN AND PROCESS PERSONAL DATA?

The personal data processed by LEO&GO as a result of users' interactions with the application come from the following sources:

- personal data provided by users via the forms made available by LEO&GO to enable registration and application use and its services or any other form or via LEO&GO's customer service.
- Personal data collected as a result of the application used by the user.
- Service usage data (driving type, speed, etc.)

In particular, LEO&GO may process and receive the following data categories:

- Identification and personal data (such as first and last name, driver's license number, e-mail address, postal address, telephone number, IP direction, etc.).
- Data related to the use of car-sharing services (such as date and time of use of the car-sharing service, incidents, etc.)
- Other types of personal data may be subject to the user's prior consent (such as analytical data, biometrics, preferences, etc.)

7. WHAT IS LEO&GO'S LEGITIMACY FOR PROCESSING YOUR PERSONAL DATA?

LEO&GO processes users' personal data under the following legal framework, depending on the type of personal data provided, as well as the interactions established between the user and LEO&GO:

- The execution of the contract or legal relationship established between LEO&GO and the users, especially for the processing of users' geolocation data.
- Compliance with legal obligations (such as those provided for tax and driving regulations) linked to the processing and possible transfer of data to administrations and competent authorities.
- Legitimate interest related to fraud prevention, LEO&GO marketing communications, profiling using internal sources, and data anonymization.

- The user's consent to carry out advertising and marketing activities for third-party products and services and data analysis using internal and external sources.
- LEO&GO, as a result of this, informs that it will only process personal data for processing activities based on consent once the user has consented to a specific processing activity through the means of obtaining consent provided by LEO&GO.

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8. HOW DO WE COMMUNICATE YOUR PERSONAL DATA?

Personal data collected by LEO&GO through the application may be communicated to the recipients below, under the communication laws:

- insurance support teams, related services such as billing or customer service;
- the competent public administrations, for the respect of tax obligations and the identification of drivers under regulations in force, among others
- purchasers, successors or assignees of our company in connection with a merger, acquisition, debt financing, asset sale or similar transaction, or in the event of insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets;
- insurance companies.

We also inform you that we may transfer your personal data to data processing service providers, some of whom are located in countries outside the European Economic Area, whose laws may not provide the same level of data protection.

In this case, we will ensure that adequate protection is in place to protect your personal data following our legal obligations. This may include a data transfer agreement with the recipient based on standard contractual clauses approved by the European Commission to transfer personal data to third countries or where the service provider has to comply with Data Protection Laws, among others. To learn more about the previously mentioned transfers and the appropriate protection we use, you may contact us using the contact information provided in this Privacy Policy.

9. HOW LONG DO WE KEEP YOUR DATA?

Your personal data will be kept for as long as the established legal relationship is maintained and for as long as it is necessary to comply with LEO&GO's legal obligations. Your personal data will always be

kept concerning other processing purposes, provided that LEO&GO can legitimately justify this and until the user requests its deletion.

10. WHAT ARE YOUR RIGHTS CONCERNING YOUR PERSONAL DATA?

Under the particular Law n°78-17 relating to information technology, files and freedoms, and Regulation (EU), you have the right to access, amend, delete, limit the processing of your personal data, object to the processing of your personal data for legitimate reasons, and have your data transferred. You also have the right to define general and specific instructions describing how you intend these rights to be exercised after your death.

Under these particular circumstances, the user may request the limitation of the data processing, in which case we will only keep it for the use of claims or the defense of such claims. The user may also object to processing their data based on reasons related to their situation, in which case we will stop processing the personal data in question, except for compelling legitimate grounds or the use of claims or the defense.

The user may request the right to data portability and obtain for themselves or another service provider certain information from the established relationship with LEO&GO. The user also has the right not to be subjected to a decision based solely on automated processing, including profiling, which may have legal effects on them or impact them significantly.

Finally, the user may withdraw consent at any time if consent has been granted for a specific purpose, without affecting the lawfulness of the data processing based on the consent before its withdrawal. We remind the user that they may object, at any time, to the processing of their personal data for commercial or promotional purposes. To exercise the previously mentioned rights or revoke the consents given, the user may contact VULOG LABS, 21 AVENUE SIMONE VEIL, 06200 NICE, indicating in the reference "Data Protection" or sending an e-mail to the following address: bonjour@leoandgo.com.

We inform you that to make your right effective; we may ask you to provide additional documents to prove your identity (for example, a copy of your identity card or passport). For any additional information regarding the processing of personal data, the user may contact LEO&GO using the contact information mentioned in this Privacy Policy.

You may also exercise your right to file a complaint with the National Data Protection Authority by sending your request to the Commission Nationale de l'Informatique et des Libertés, by mail to the following address: 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07, or on the CNIL website available at the following address: <https://www.cnil.frou> or by phone at the following number: 01 53 73 22 22.