

**IDriver Privacy Notice** 

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I. Introduction

When you use IDriver, you trust us with your personal data. We're committed to keeping that trust. That starts with helping you understand our privacy practices.

This notice describes the personal data ("data") we collect, how it's used and shared, and your choices regarding this data. We recommend that you read this along with our privacy overview, which highlights key points about our privacy practices.

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- II. Overview
- A. Scope

This notice applies to users of IDriver's services anywhere in the world, including users of IDriver's apps, websites, features, or other services.

This notice describes how IDriver and its affiliates collect and use data. This notice applies to all IDriver users globally, unless they use a service covered by a separate privacy notice, such as IDriver Freight or Careem. This notice specifically applies to:

• Riders: individuals who request or receive transportation and related services via their IDriver account.

• Drivers: individuals who provide transportation to Riders individually or through partner transportation companies.

• Order recipients: individuals who request or receive food or other products and services for delivery or pick-up via their IDriver Eats, Cornershop or Postmates account. This includes individuals who use guest checkout features to access delivery or pick-up services without creating and/or logging into their account.

• Delivery persons: individuals who provide delivery services via IDriver Eats, Cornershop or Postmates.

• Guest Users: individuals who receive ride and delivery services ordered by other IDriver account owners, including those who receive services arranged by IDriver Health, IDriver Central, IDriver Direct or IDriver for Business customers (collectively, "Enterprise Customers"), or by friends, family members or other individual account owners.

This notice also governs IDriver's other collections of data in connection with its services. For example, we may collect the contact information of owners or employees of restaurants or other merchants on the IDriver Eats, Cornershop or Postmates platforms; the contact information of individuals that manage and

use accounts owned by Enterprise Customers; or data of individuals who start but do not complete their applications to be drivers or delivery persons.

All those subject to this notice are referred to as "users" in this notice.

Our privacy practices are subject to applicable laws in the places in which we operate. This means that we engage in the practices described in this notice in a particular country or region only if permitted under the laws of those places. In addition, please note the following:

• For users in Argentina: The Public Information Access agency, in its role of Regulating Body of Law 25.326, is responsible for receiving complaints and reports presented by any data subjects who believe their rights have been impacted by a violation of the local data protection regulation.

• For users in Brazil: Please see here for information regarding IDriver's privacy practices required under Brazil's General Data Protection Law (Lei Geral de Proteção de Dados - LGPD).

• For users in the United States : Information regarding IDriver's privacy practices required under U.S. state privacy laws, including the California Consumer Privacy Act), is available here.

• For users in Colombia and Jamaica: "Riders" and "drivers" as defined in this Notice are known respectively as "lessors" and "lessees" in Colombia and Jamaica.

• For users in Mexico: Please see here for information regarding IDriver's privacy practices required under Mexico's Personal Data Protection Law (Ley Federal de Protección de Datos Personales en Posesión de los Particulares).

• For users in Nigeria: IDriver processes the data of users in Nigeria on the grounds that it is necessary to fulfill the terms of our agreements with those users, or based on their consent.

• For users in South Korea: Please see here for information about IDriver affiliate UT LLC's privacy practices.

Please contact us here or through the addresses below with any questions regarding our practices in a particular country or region.

### B. Data controller and transfer

IDriver B.V. and IDriver Technologies Inc. are the data controllers for the data collected in connection with use of IDriver's services in the European Economic Area, the United Kingdom and Switzerland.

IDriver Technologies Inc. is the data controller for the data collected in connection with use of IDriver's services everywhere else.

IDriver B.V. (Burgerweeshuispad 301, 1076 HR Amsterdam, The Netherlands) and IDriver Technologies Inc. (1515 3rd Street, San Francisco, CA, 94158, USA) are the data controllers for the data collected in connection with use of IDriver's services in the European Economic Area, the United Kingdom and Switzerland.

In addition, for drivers in the UK, (1) the IDriver entity holding the relevant private hire vehicle operator license is the data controller for the data required to comply with licensing requirements; and (2) IDriver B.V., IDriver Technologies, and the IDriver entity with whom the driver has entered into a contract, are joint controllers for the data required to comply with worker rights.

IDriver Technologies Inc. is the data controller for the data collected in connection with use of IDriver's services everywhere else.

IDriver operates, and processes personal data, globally; wherever and whenever you travel, your data travels with you so we can offer you a seamless experience. We also respect your data protection rights whether you are in your home country or elsewhere.

This means that we may transfer personal data to countries other than your home country in order to provide our services in a different country at your request. We may also transfer personal data to another country if that is necessary to respond to a customer support request that you submitted outside your region. And trip/order histories may be accessed by users in another country after they have left the country where services were rendered. Because our services involve multiple users at the same time, limited personal data may be accessible to the other user in another country.

We do so in order to fulfill our agreements with all of our users, or based on users' instructions or prior consent, adequacy decisions for the relevant countries, or other transfer mechanisms as may be available under applicable law, such as the Standard Contractual Clauses.

We may also transfer data to other countries in order to respond to a request for personal data from a law enforcement agency. To provide additional safeguards to these data transfers, IDriver applies a robust internal procedure for processing these requests. IDriver only discloses personal data to law enforcement agencies in a manner that is consistent with the regulatory requirements of applicable laws, such as the GDPR. You can find more information about requests from law enforcement here.

To help provide equivalent data protection wherever you use our services, IDriver has implemented the following measures across the globe:

• policies and procedures to limit access to, and the processing of personal data for defined purposes;

specific training of personnel responsible for managing personal data;

• a government data access policy that refuses government access to data, except when disclosure is mandated by applicable laws including the EU GDPR, there is imminent risk of serious harm to individuals, or consent is obtained;

• robust protection of data while it is in transit between IDriver apps and our servers, and when the data is processed on our servers. This includes encryption and the use of pseudonymized data to help protect users' full identity against unauthorized disclosure.

For your convenience, the exercise of your data protection rights can be directed to IDriver via any of the designated channels mentioned above, and will be handled centrally on behalf of the relevant controller. Questions, comments, and complaints about IDriver's data practices can be submitted here. You may also use this form to submit a question to IDriver's Data Protection Officer and to ask us for a copy of the Standard Contractual Clauses or other transfer mechanisms in place for the data processing activity of your inquiry.

III. Data collections and uses

A. The data we collect

IDriver collects data:

- provided by users to IDriver, such as during account creation
- created during use of our services, such as location, app usage, and device data

• from other sources, such as other users or account owners, business partners, vendors, insurance and financial solution providers, and governmental authorities

For your convenience, we've provided a visual summary of the data we collect and how we use it here.

IDriver collects the following data:

1. Data provided by users. This includes:

• User profile information: We collect data when users create or update their IDriver accounts, or place orders via guest checkout features. This may include their name, email, phone number, login name and password, address, profile picture, payment or banking information (including related payment verification information), driver's license and other government issued documents (which may include identification numbers as well as birth date, gender, and photo). This also includes vehicle or insurance information of drivers and delivery persons, emergency contact information, user settings, and evidence of health or fitness to provide services using IDriver apps.

• Background check information (drivers and delivery persons): This includes information submitted during the driver/delivery person application process, such as driver history or criminal record (where permitted by law), license status, known aliases, prior addresses, and right to work. This information may be collected by an authorized vendor on IDriver's behalf.

• Identity verification photos: This includes photos of users (such as, selfies) and/or their government issued identifications (such as, driver's license or passports). Such photos may be used to verify a user's identity, such as through facial verification technologies. Please see the section titled "How we use personal data" for more information regarding how user photos are used for safety and security purposes, including identity verification.

• Demographic data: We may collect demographic data about users, such as birth date/age, gender or occupation, when required for certain IDriver services or programs, such as IDriver Cash, alcohol deliveries or safety features that allow women users to set a preference to provide or receive services to/from other women ("Women Rider Preference"). We may also collect demographic data, such as age group and household composition, through user surveys, and use this information to offer IDriver products and services that are likely to be of interest to you.

We may also infer demographic data from other data collected from users. For example, we may infer a user's gender based on their first name to enable safety features, such as the Women Rider Preference, or to display personalized ads for third party products or services. See the section titled "How we use personal data" below for more information.

• User content: We collect the data submitted by users when they contact IDriver customer support (including at IDriver Greenlight Hubs or via phone chat or video conferencing tools), provide ratings or feedback for other users, restaurants or merchants, or otherwise contact IDriver. This may include photographs, or audio or video recordings submitted by users in connection with a customer support request. This also includes metadata relating to the method you use to communicate with IDriver. The contents of photos and recordings submitted by users are subject to IDriver's Community Guidelines (except that such guidelines do not apply to users in Switzerland and Belgium).

In certain jurisdictions, users can record the audio and/or video of their trips through an in-app feature or using a dashcam. In app recordings are encrypted and stored on users' devices, and are only shared with IDriver if submitted by the users in connection with safety incidents. Please see here for more information.

• Travel information: We collect travel itinerary information, including times and dates of upcoming flight, lodging or car rental reservations, from users of our IDriver Travel feature. We collect such information: (i) when users manually input their information into their IDriver Travel itinerary; or (2) if authorized by users to access their email account, from travel-related email confirmations. If so authorized, IDriver will only access users' email accounts to collect travel itinerary information to enable the IDriver Travel feature, and will adhere to the applicable email provider policies, including Google's API Services User Data Policy, which impose certain limitations on the use of data collected from users' email accounts. Users may remove IDriver's access to their email accounts at any time either in-app or through their email service provider settings. Detailed information on how to remove email account access is available here.

2. Data created during use of our services. This includes:

• Location data (driver and delivery person): We collect precise or approximate location data from drivers' and delivery persons' mobile devices when the IDriver app is running in the foreground (app open and on-screen) or background (app open but not on-screen).

• Location data (riders and order recipients). We collect precise or approximate location information from riders' and order recipients' mobile devices if they enable us to do so via their device settings.

IDriver collects such data from the time a ride or order is requested until it is finished, and any time the app is running in the foreground (app open and on-screen). See "Choice and transparency" below for information on how riders and order recipients can enable precise location data collection.

Riders and order recipients may use the IDriver apps without enabling collection of location data from their mobile devices. However, this may affect certain features in the IDriver apps. For example, a rider who has not enabled precise location data will have to manually enter their pickup address.

In addition, precise location data collected from a driver's device during a trip is linked to the rider's account, even if the rider has not enabled precise location data to be collected from their device. This data is used for purposes such as receipt generation, customer support, fraud detection, insurance, and litigation.

• Transaction information: We collect transaction information related to the use of our services, including the type of services requested or provided; trip or order details (such as date and time, requested pick-up and drop off addresses, distance traveled and items ordered); and payment transaction information (such as a restaurant's or merchant's name and location, amount charged, and payment method). We also associate a user's name with that of anyone who uses their promotion code.

• Usage data: We collect data about how users interact with our services. This includes access dates and times, app features or pages viewed, browser type, and app crashes and other system activity.

• Device data: We collect data about the devices used to access our services, including the hardware models, device IP address or other unique device identifiers, operating systems and versions, software, preferred languages, advertising identifiers, device motion data, and mobile network data.

• Communications data: We collect data regarding phone, text or in-app communications between users that are enabled through IDriver's apps. This includes date and time, as well as the content of text or in-app messages. We may also collect the content of phone calls solely where users are notified in advance that the call may be recorded.

3. Data from other sources. These include:

• users participating in our referral programs. For example, when a user refers another person, we receive the referred person's data from that user.

• IDriver account owners who request services for or on behalf of other users (such as friends or family members), or who enable other users to request or receive services through their business accounts (such as owners of IDriver Health, IDriver Central, IDriver Direct or IDriver for Business accounts).

• users or others providing information in connection with claims or disputes.

• IDriver business partners through which users create or access their IDriver account, such as payment providers, social media services, or apps or websites that use IDriver's APIs or whose APIs IDriver uses.

• IDriver business partners in connection with debit or credit cards issued by a financial institution in partnership with IDriver to the extent disclosed in the terms and conditions for the card.

• vendors who help us verify users' identity, background information, and eligibility to work, or who screen users in connection with sanctions, anti-money laundering, or know-your-customer requirements.

• insurance, vehicle, or financial services providers for drivers and/or delivery persons.

• partner transportation companies (for drivers or delivery persons who use our services through an account associated with such a company).

- publicly available sources.
- marketing service providers or data resellers whose data IDriver uses for marketing or research.
- law enforcement officials, public health officials, and other government authorities.

B. How we use personal data

IDriver uses data to enable reliable and convenient transportation, delivery, and other products and services. We also use such data:

- to enhance the safety and security of our users and services
- for customer support
- for research and development
- to enable communications between users
- for marketing and advertising
- to send non-marketing communications to users
- in connection with legal proceedings

For your convenience, we've provided a visual summary of the data we collect and how we use it here.

We use the data we collect:

1. To provide our services. IDriver uses data to provide, personalize, maintain, and improve our services.

This includes using data to:

- create/update accounts.
- enable transportation, delivery and other services/features, such as:

o using location data to navigate rider pick-ups and order drop-offs, calculate ETAs, and track the progress of rides or deliveries.

o features that involve data sharing, such as sharing driver first name and vehicle information with riders to facilitate pick-ups, user profile and trip details for ETA sharing and fare splitting, and user ratings and compliments.

o match available drivers and delivery persons to users requesting services. Users can be matched based on availability, location/proximity, user settings/preferences and other factors such as likelihood to accept a trip based on their past behavior or preferences.

o features that facilitate use of our services by those with disabilities.

o features that involve account linking, such as linking of email to create IDriver Travel itineraries and linking of rewards programs to enable partnership benefits (such as with Marriott Bonvoy).

• enable dynamic pricing, in which ride prices, or delivery fees are determined based on factors such as estimated time and distance, predicted route, estimated traffic, and the current number of users requesting or providing services.

process payments.

• personalize users' accounts. For example, we may present order recipients with personalized restaurant or food recommendations based on their prior orders.

• facilitate insurance, vehicle, invoicing, or financing solutions.

• provide users with trip or delivery updates, generate receipts, and inform them of changes to our terms, services, or policies.

• perform necessary operations to maintain our services, including to troubleshoot software bugs and operational problems.

IDriver performs the above activities on the grounds that they are necessary to fulfill the terms of our agreements with users, are compatible with such uses, or on the grounds that they are necessary for purposes of IDriver's and its users' legitimate interests.

2. Safety and security. We use data to help maintain the safety, security, and integrity of our services and users. This includes:

• verifying users' identity and eligibility to provide transportation or deliveries, including through reviews of background checks, to help prevent use of our services by unsafe drivers and/or riders.

In certain regions, this includes IDriver's Real-Time ID Check feature, which prompts drivers and delivery persons to share a selfie before going online to help ensure that the driver or delivery person using the app matches the IDriver account we have on file. We may also use this feature for other verification purposes such as verifying change of bank account information or regaining account access.

In addition, we may use facial recognition technology to process user profile photographs, identification photographs, or other user-submitted photographs to prevent identity-borrowing or use of our services by unauthorized drivers or delivery people.

We may also use selfies to verify that users are wearing masks, helmets or other safety gear through the use of object verification technology.

In some countries, riders may be required to verify their identity to use cash and certain other payment methods. In such cases, IDriver allows riders to provide their ID number and/or a photo of their identification card to complete such verifications. Please see here for more information about rider identity verification.

Similarly, order recipients may be required to provide their age and an image of their government issued identification to verify their eligibility to order and receive alcohol deliveries. Please see here for more information about order recipient identity verification.

• using data from drivers' or delivery persons' devices to detect unsafe driving behavior such as speeding or harsh braking and acceleration, and to inform them of safer driving practices. We also use data from delivery persons' devices to verify the type of vehicles they used to provide deliveries.

• using driver location information, and communications between riders and drivers, to identify cancellation fees earned or induced through fraud. For example, if we determine that a driver is delaying a rider pickup in order to induce a cancellation, we will not charge the rider a cancellation fee and will adjust the amounts paid to the driver to omit such a fee. To object to such an adjustment, please contact IDriver customer support.

• using device, location, user profile, usage, and other data to prevent, detect, and combat other types of fraud. This includes identifying fraudulent accounts or uses of our services, preventing use of our services by unauthorized drivers or delivery persons, verifying user identities in connection with certain payment methods, and preventing and combating unauthorized access to users' accounts. In some cases, such as when a user is determined to be abusing IDriver's referral program or has submitted fraudulent documents, such behavior may result in automatic deactivation, or in the European Union or where otherwise required by law, deactivation after human review. To object to such a deactivation, please contact IDriver customer support.

• using user ratings, reported incidents, and other feedback to encourage compliance with our Community Guidelines and as grounds for deactivating users with low ratings or who otherwise violated such guidelines in certain countries. (This data use is not performed in Switzerland and Belgium). In the European Union or where otherwise required by law, such deactivation occurs only after human review and/or the possibility to appeal. For more information about how ratings are determined and used, please see here for rider ratings, here for driver ratings, and here for delivery person ratings. To object to such a deactivation, please contact IDriver customer support.

• using driver data (such as past trip information and reported incident rates) and rider data (such as past trip information, cancellation and reported incident rates, account information, ratings information, and current pick-up and drop-off location) to predict and help avoid pairings of users that may result in increased risk of conflict (for instance, because one user previously gave the other a one-star rating).

• sharing user name, location, phone number, vehicle details and other relevant information with third-party companies that support the management and de-escalation of interpersonal conflicts that may occur between users while on a trip or in the process of making a delivery.

IDriver performs the above activities on the grounds that they are necessary to fulfill the terms of our agreements with users, and/or for purposes of the legitimate safety and security interests of IDriver, our users and members of the general public.

3. Customer support. IDriver uses the information we collect (which may include call recordings) to provide customer support, including to investigate and address user concerns and to monitor and improve our customer support responses and processes.

IDriver performs the above activities on the grounds that they are necessary to fulfill the terms of our agreements with users or for purposes of IDriver's legitimate interest in monitoring and improving its customer support services.

4. Research and development. We use data for testing, research, analysis, product development, and machine learning to improve the user experience. This helps us make our services more convenient and easy-to-use, enhance the safety and security of our services, and develop new services and features.

IDriver performs the above activities on the grounds that they are necessary for purposes of IDriver's legitimate interests in improving and developing new services and features.

5. Enabling communications between users. For example, a driver may message or call a rider to confirm a pick-up location, a rider may call a driver to retrieve a lost item, or a restaurant or delivery person may contact an order recipient with information about their order.

IDriver performs the above activities on the grounds that they are necessary to fulfill the terms of our agreements with users.

6. Marketing and Advertising. IDriver uses data (other than Guest Users' data) to market its services, and those of IDriver partners. This may include:

• Sending emails, text messages, push notification, and in-app messages or other communications marketing or advertising IDriver products, services, features, offers, promotions, sweepstakes, news and events.

This may include using location, trip and order history, device data and usage data to send marketing communications that are personalized based on users' observed or inferred interests and characteristics. For example, we may send push notifications suggesting a user's favorite destinations or merchants, or in-app messages offering discounts or promo for products or merchants similar to those a user has previously ordered.

• Displaying IDriver advertising on third party apps or websites. This includes using location, trip and order history, device data and usage data, and sharing hashed email addresses and device or user identifiers with advertising partners (such as Facebook and TikTok), to personalize such ads to users' interests.

• Displaying third party advertising in IDriver's apps or in connection with our services.

This includes ads for restaurants or merchants that are available on IDriver's apps. These ads (which are identified as "Sponsored Listings" in IDriver's apps) include recommendations that are personalized based on users' location and order histories.

This also includes ads for other third party products or services that are personalized based on users' observed or inferred interests and characteristics, which we determine using data such as approximate location, trip information and history, usage data, demographic data (which may include inferred gender), and device or user identifiers.

This also includes ads that are personalized based on data about the current trip or delivery request, including time of request and services requested. For example, if a user requests a trip to a supermarket, we may display in-app ads for third party products that may be available at that supermarket.

• Measuring the effectiveness of IDriver's ads, and of third party ads displayed in IDriver's apps or in connection with our services.

IDriver performs the above activities on the grounds that they are necessary for purposes of IDriver's legitimate interests in informing users about IDriver services and features or those offered by IDriver partners. See the sections titled "Choice and transparency" and "Marketing and advertising choices" for information on your choices regarding how IDriver may use your data for marketing and advertising.

7. Non-marketing communications. IDriver may use data to send surveys and other communications that are not for the purpose of marketing the services or products of IDriver or its partners. We may also send users communications regarding elections, ballots, referenda, and other political processes that relate to our services. For example, IDriver has notified some users by email of ballot measures or pending legislation relating to IDriver's services in those users' areas.

IDriver performs the above activities on the grounds that they are necessary to fulfill the terms of our agreements with users, or for purposes of IDriver's and its users' legitimate interests in informing users about events that may have an impact on their use of IDriver services.

8. Legal proceedings and requirements. We use data to investigate or address claims or disputes relating to use of IDriver's services, to satisfy requirements under applicable laws, regulations, or operating licenses or agreements, or pursuant to legal process or governmental request, including from law enforcement.

IDriver performs the above activities on the grounds that they are necessary for purposes of IDriver's legitimate interests in investigating and responding to claims and disputes relating to use of IDriver's services and features, and/or necessary for compliance with applicable legal requirements.

### C. Cookies and third-party technologies

IDriver and its partners use cookies and other identification technologies on our apps, websites, emails, and online ads for purposes described in this notice, and IDriver's Cookie Notice.

Cookies are small text files that are stored on browsers or devices by websites, apps, online media, and advertisements. IDriver uses cookies and similar technologies for purposes such as:

- authenticating users
- remembering user preferences and settings
- determining the popularity of content
- delivering and measuring the effectiveness of advertising campaigns

• analyzing site traffic and trends, and generally understanding the online behaviors and interests of people who interact with our services

We may also allow others to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the internet, and to track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs, and other technologies to identify the devices used by visitors to our websites, as well as when they visit other online sites and services.

Please see our Cookie Notice for more information regarding the use of cookies and other technologies described in this section.

### D. Data sharing and disclosure

Some of IDriver's services and features require that we share data with other users or at a user's request. We may also share such data with our affiliates, subsidiaries, and partners, for legal reasons or in connection with claims or disputes.

IDriver may share data:

1. With other users

This includes sharing:

• riders' first name, rating, and pickup and/or dropoff locations with drivers.

• riders' first name with other riders in a carpool trip. Riders in carpool trips may also see the dropoff location of the other riders.

• order recipients' first name, delivery address, and order information with the restaurant or merchant and, for order deliveries, with the delivery person. We may also share ratings and feedback, or other information to the extent required by law, with the restaurant or merchant and, for order deliveries, the delivery person.

• for drivers and delivery persons, we may share data with the rider(s), order recipient(s) and restaurants or merchants, including name and photo; vehicle make, model, color, license plate, and vehicle photo; location (before and during trip); average rating provided by users; total number of trips; period of time since they signed up to be a driver or delivery person; contact information; and driver or delivery person profile, including compliments and other feedback submitted by past users.

We also provide riders and order recipients with receipts containing information such as a breakdown of amounts charged, driver or delivery person first name, photo, and route map. We also include other information on those receipts if required by law.

• for those who participate in IDriver's referral program, we share certain data of referred users, such as trip count, with the user who referred them, to the extent relevant to determining the referral bonus.

2. At the user's request

This includes sharing data with:

• Other people at the user's request. For example, we share a user's ETA and location with a friend when requested by that user, or a user's trip information when they split a fare with a friend.

• IDriver business partners. For example, if a user requests a service through a partnership or promotional offering made by a third party, IDriver may share certain data with those third parties. This may include, for example, other services, platforms, apps, or websites that integrate with our APIs; vehicle suppliers or services; those with an API or service with which we integrate; or restaurants, merchants or other IDriver business partners and their users in connection with promotions, contests, or specialized services.

• Emergency services: We offer features that enable users to share their data with police, fire, and ambulance services in the event of an emergency or after certain incidents. For more information, please see the sections below titled "Choice and Transparency" and "Emergency Data Sharing".

3. With the general public

Questions or comments from users submitted through public forums such as IDriver blogs and IDriver social media pages may be viewable by the public, including any data included in the questions or comments submitted by a user.

4. With the IDriver account owner

If a user receives services through an account owned by another party, we may share their trip or order information, including location data, with the owner of that account. This occurs, for example, when:

• a rider uses their employer's IDriver for Business profile, such as when they take trips arranged through IDriver Central.

• a driver or delivery person uses an account owned by or associated with an IDriver partner transportation company or restaurant.

• a rider takes a trip or a delivery recipient receives an order arranged by a friend or under a family profile.

a delivery person acts as a substitute (UK only).

In addition, if a user creates an account using an email address affiliated with an IDriver for Business account owner (i.e., their employer), we may use, and share their profile data (such as name and email address) with such account owner, to help that user expense trips or orders to that IDriver for Business account. This is applicable in all regions except the European Economic Area, the United Kingdom and Switzerland.

5. With IDriver subsidiaries and affiliates

We share data with our subsidiaries and affiliates to help us provide our services or conduct data processing on our behalf. For example, IDriver processes and stores such data in the United States on behalf of its international subsidiaries and affiliates, such as Cornershop. For more information, please visit our Cornershop Data Sharing Policy.

6. With IDriver service providers and business partners

These include:

- payment processors and facilitators
- background check and identity verification providers
- cloud storage providers

• Google, in connection with the use of Google Maps in IDriver's apps (see Google's privacy policy for information on their collection and use of data)

• social media companies, including Facebook and TikTok, in connection with IDriver's use of their tools in IDriver's apps and websites (see Facebook's privacy policy and TikTok's privacy policy for information on their collection and use of data)

• marketing partners and marketing platform providers, including social media advertising services, advertising networks, third-party data providers, and other service providers to reach or better understand our users and measure advertising effectiveness

This includes advertising intermediaries, such as Google, Criteo and Rokt, that enable IDriver to display and measure the effectiveness of personalized ads for third party products that are displayed in IDriver's apps. We share data such as advertising or device identifier, hashed email address, approximate location, and current trip or order information, and the intermediaries use this data to provide their services and such other purposes are disclosed in their privacy notices. Users may opt out from ad personalization in the IDriver app here and in the IDriver Eats app here. For more information regarding these intermediaries' privacy practices, including how to submit requests to them relating to their handling of personal data, please see their privacy notices linked above.

• research partners, including those performing surveys or research projects in partnership with IDriver or on IDriver's behalf

- vendors that assist IDriver to enhance the safety and security of IDriver apps and services
- consultants, lawyers, accountants, and other professional service providers
- insurance and financing partners
- airports
- providers of bike and scooters that can be rented through IDriver apps, such as Lime
- third-party vehicle suppliers, including fleet and rental partners

7. For legal reasons or in the event of a dispute

IDriver may share users' data if we believe it's required by applicable law, regulation, operating license or agreement, legal process or governmental request, or where the disclosure is otherwise appropriate due to safety or similar concerns.

This includes sharing data with law enforcement officials, public health officials, other government authorities, airports (if required by the airport authorities as a condition of operating on airport property), or other third parties as necessary to enforce our Terms of Service, user agreements, or other policies; to protect IDriver's rights or property or the rights, safety, or property of others; or in the event of a claim or dispute relating to the use of our services. In the event of a dispute relating to use of another person's credit card, we may be required by law to share your data, including trip or order information, with the owner of that credit card.

For more information, please see IDriver's Guidelines for Law Enforcement Authorities - United States, Guidelines for Law Enforcement Authorities - Outside the US, and Guidelines for Third Party Data Requests and Service of Legal Documents.

This also includes sharing data with others in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company.

8. With consent

IDriver may share a user's data other than as described in this notice if we notify the user and they consent to the sharing.

### E. Data retention and deletion

IDriver retains user data for as long as necessary for the purposes described above, including to provide its services and comply with legal obligations.

IDriver retains user data for as long as necessary for the purposes described above. The period for which we retain user data is determined by the type of data, the category of user to whom the data relates, and the purposes for which we collected the data.

The length for which IDriver retains user data may further be determined by legal and regulatory requirements, purposes of safety, security, and fraud prevention, or by issues relating to the user's account such as an outstanding credit or an unresolved claim or dispute.

For example, we retain data:

- for the life of users' accounts if such data is necessary to provide our services. E.g., user profile information and credentials.
- for 7 years if necessary to comply with tax requirements. E.g., drivers' and delivery persons' trip or delivery location information.
- for defined periods as necessary for purposes of safety or fraud prevention. E.g., we retain incomplete driver applications for 1 year, and rejected driver applications for 7 years.

• after requests for account deletion if necessary for purposes of safety, security, fraud prevention or compliance with legal requirements, or because of issues relating to the user's account (such as an outstanding credit or an unresolved claim or dispute).

Users may request deletion of their accounts at any time. IDriver may retain user data after a deletion request due to legal or regulatory requirements or for reasons stated in this policy.

Users may request deletion of their account at any time through the Settings > Privacy menus in the IDriver app, or through IDriver's website (riders and order recipients here; drivers and delivery persons here; guest checkout users here).

Following an account deletion request, IDriver deletes the user's account and data, unless they must be retained due to legal or regulatory requirements, for purposes of safety, security, and fraud prevention, or because of an issue relating to the user's account such as an outstanding credit or an unresolved claim or dispute. Because we are subject to legal and regulatory requirements relating to drivers and delivery persons, this generally means that we retain their account and data for the applicable statutory retention period after a deletion request. For riders and order recipients, their data is generally deleted within 90 days of a deletion request, except where retention is necessary for the above reasons.

# IV. Choice and transparency

IDriver enables users to access and/or control data that IDriver collects, including through:

- privacy settings
- device permissions
- in-app ratings pages
- marketing choices

IDriver also enables users to request access to or copies of their data, make changes or updates to their accounts, request deletion of their accounts, or request that IDriver restrict its processing of user data.

### A. Privacy settings

The Settings > Privacy menu in the IDriver app allows riders and order recipients to set or update their preferences regarding location data collection and sharing, emergency data sharing, and notifications. Our Privacy Center is also available in web version.

Location data collection (riders and order recipients)

Riders and order recipients can enable/disable IDriver to collect location data from their mobile devices through their device settings, which can be accessed via the Settings > Privacy > Location menu.

• Share Live Location (Riders)

Riders can enable/disable IDriver to share their real-time location data from their mobile devices with their drivers through their device settings, which can be accessed via the Settings > Privacy > Location menu.

Emergency Data Sharing

Riders may enable IDriver to share real-time location data from their mobile devices with emergency police, fire, and ambulance services. Such data may include approximate location at the time the emergency call was placed; the car's make, model, color, and license plate information; the rider's name and phone number; pickup and dropoff locations; and the driver's name.

Riders may enable/disable this feature via the Settings > Privacy > Location menu, or the Safety Center.

Drivers and delivery persons can also enable/disable Emergency Data Sharing via the App settings > Emergency Data Sharing menu, or the Safety Toolkit.

Notifications: account and trip updates

IDriver provides users with trip status notifications and updates related to activity on their account. These notifications are a necessary part of using the IDriver app and cannot be disabled. However, users may choose the method by which they receive these notifications through the Settings > Privacy menu.

Notifications: discounts and news

Users may enable IDriver to send push notifications about discounts and news from IDriver. Push notifications may be enabled or disabled through the Settings > Privacy menus in the IDriver app.

Communications from restaurants and merchants

While placing an order in the IDriver Eats app, users may opt-in to share their contact details with certain restaurants or merchants in order to receive communications from them. Those who opt-in may choose to cease receiving such communications through the Settings > Account > Data Sharing menus in the IDriver Eats app.

### B. Device permissions

Most mobile device platforms (iOS, Android, etc.) have defined certain types of device data that apps cannot access without the device owner's permission, and these platforms have different methods for how that permission can be obtained. Please check the available settings on your device or check with your provider.

### C. In-app ratings pages

After every trip, drivers and riders are able to rate each other on a scale from 1 to 5. An average of those ratings is associated with a user's account and is displayed to other users for whom they provide or receive services. For example, rider ratings are available to drivers from whom they request transportation, and driver ratings are available to their riders.

This 2-way system holds everyone accountable for their behavior. Accountability helps create a respectful, safe environment for drivers and riders.

Riders can see their average rating in the main menu of the IDriver app, and also access a breakdown of their average rating in IDriver's Privacy Center.

Drivers can see their average rating after tapping their profile photo in the IDriver Driver app. Click here for more information.

Delivery persons may also be rated by order recipients, restaurants and merchants. Click here for more information.

D. Marketing and advertising choices

IDriver provides users with the following choices regarding how their data is used for purposes of marketing and advertising:

• Personalized marketing communications from IDriver: Users may choose here whether IDriver may use their data to send personalized communications (such as, emails, push notifications, and in-app messages) about IDriver products and services. Users may also choose here whether to receive any marketing emails or push notifications from IDriver.

• IDriver ads: Users may choose here whether their data is used and shared with advertising partners to deliver personalized ads about IDriver products and services on third party apps and websites, or to measure the effectiveness of such ads.

• Restaurant and merchant ads: Users may choose here whether IDriver may use their order and search history to display personalized ads for restaurants or merchants that are available on IDriver Eats.

• Third party ads: Users may choose here whether IDriver may use their data to display ads for third party products or services that are personalized based on users' observed or inferred interests and characteristics.

• Cookies and related technologies: For information on how to control IDriver's use of cookies and related technologies, including for purposes of displaying personalized ads, please see our Cookie Notice.

### E. User data requests

IDriver provides users with a variety of ways to learn about, control, and submit questions and comments about IDriver's handling of their data.

• Accessing data: Users can access data including their profile data and trip or order history through the IDriver apps or via IDriver's website. Users can also use our Explore Your Data feature to view an online summary of information about their account, such as number of trips or orders, rating, rewards status, and number of days since they've been an IDriver user. Users can also request access to their data (riders and order recipients here; drivers and delivery persons here).

• Data portability: Users can request a copy of their data using our Download Your Data tool. For an overview of the data available through that tool, please click here. Users may also request a copy of their data (riders and order recipients here; drivers and delivery persons here).

• Changing or updating data: Users can edit the name, phone number, email address, payment method, and photo associated with their account through the Settings menu in IDriver's apps or driver portal. Users may also request to update or correct their data (riders and order recipients here; drivers and delivery persons here).

• Deleting data: Users may request deletion of their account at any time through IDriver's Privacy Center, or in the Settings > Privacy menus in the IDriver app.

• Objections, restrictions, and complaints: Users may request that we stop using all or some of their data, or that we limit our use of their data (riders and order recipients here; drivers and delivery persons here). This includes objecting to our use of data that is based on IDriver's legitimate interests. IDriver may continue to process data after such objection or request to the extent required or permitted by law.

In addition, depending on their location, Users may have the right to file a complaint relating to IDriver's handling of their data with the data protection authority in their country. For example, users in the European Union and South America may submit such requests to the data protection authorities in the country in which they live.

• Appeal: Users that reside in the U.S. may request a review of our decision in the event IDriver cannot meet or denies a User's data request. Users may request an appeal of our decision here.

## V. Updates to this notice

We may occasionally update this notice.

We may occasionally update this notice. If we make significant changes, we will notify users in advance of the changes through the IDriver apps or through other means, such as email. We encourage users to periodically review this notice for the latest information on our privacy practices.

Use of our services after an update constitutes consent to the updated notice to the extent permitted by law.