

TaxiMe Privacy Policy for Passengers

Privacy notices for passengers in accordance with the EU's General Data Protection Regulation ('GDPR')

Information as of May 2018

This document provides an overview of our approach to processing your personal data and your rights under the provisions of data protection legislation in connection with the use of our ride-hailing app for passengers ('TaxiMe App'). The personal data processed depends largely on the services or products you use in any given case.

Classification

1. Data controller and contact
2. Processing purposes and data categories
3. Provider of processing services and processing in countries outside the European Economic Area
4. Your rights
5. Data security
6. Storage period

1. Information on the data controller

Data controller under Article 4(7) GDPR for passengers in the territory of EU:

TaxiMe OOD (TaxiMe)
47A Cherni Vrah Blvd.
Sofia, 1407

Email address: gdpr@taxime.to

2. Processing purposes and data categories

We aim to inform you about the various types of personal data we process and the purposes for which we do this below.

2.1 Ride-hailing

The TaxiMe App enables you to hail a ride in a taxi with a taxi driver ('driver') through us. You must provide personal data to use our TaxiMe App for ride-hailing, which we process to provide the given service. Additional voluntary information that may also be provided is marked accordingly (optional).

In the context of the hailing service, the following personal data will be processed in accordance with Article 6(1.)(b) GDPR for the performance of the contract:

- Your GPS location data at the time of booking, the start and destination coordinates of your ride, unique identifier of your device (Advertising Identifier on iOS, Android ID on Android)
- Name, email address and mobile phone number, password you have chosen (in encrypted form) (optional).

You either enter the personal data (e.g. your name) at the time of registration or we receive it directly from your device (e.g. GPS location data). You approve the transmission of your GPS location data via your device's (smartphone, tablet, etc.) operating system. We need the GPS coordinates of your location so that the taxi you have ordered can find and collect you.

We will forward your GPS location data to the driver who has accepted the ride you have booked so that he is able to pick you up.

It will not be possible for you to hail taxis through us if we do not process the personal data shown above. This does not apply to optional information.

2.2 Payment

You can pay for taxi rides hailed through us in cash or by credit/debit card via the app. The card payment functionality enables you to pay without cash using the TaxiMe App. We will then debit the amount via your specified means of payment. If you register, your payment card in the app, it will be transmitted directly to the payment service provider engaged by us via an encrypted connection. Our payment service provider then authenticates your means of payment by charging BGN 0.20 on your account and then refunds the amount. This ensures your means of payment is active. Our payment service provider is PCI DSS certified (Payment Card Industry Data Security Standard). Only the first digit of your credit card number is transmitted to us for security reasons and we store it for the purposes of inferring your card type (VISA, MasterCard, etc.).

In the context of payment, the following personal data will be processed in accordance with Article 6(1.)(b) GDPR for the performance of the contract:

- Payment card number, name of card holder, card expiry date, CVV number.

We cannot offer you card payments for your trips if we do not process these personal data. You can still pay in cash, however.

2.3 Fraud prevention and non-payment

Since TaxiMe bears the risk of non-payment in the event that payments made by credit or debit card are not honoured, an assessment of the risk of non-payment is made on the basis of a statistical procedure (scoring) after your registration in the app, each time a new means of payment chosen by you is entered, and each time a ride is booked, so as to protect TaxiMe's legitimate interests in accordance with Article 6 (1.) (f) and 22(2.)(b) GDPR.

The following personal data are processed to determine the value:

- First and last name (if provided), start and destination coordinates of your ride, mobile phone number, email address, payment card's expiry date, information about your device (device ID), and the TaxiMe App version.

To protect you against overpaying for taxi rides, the driver's mobile phone transmits GPS location data to us at short intervals during a taxi ride, enabling us to map the entire journey. We do this because we want to ensure the driver does not extend the route intentionally to earn higher remuneration.

If you believe you have paid too much, you may ask us about the route covered after a ride. The processing of your GPS location data takes place for your and our protection against fraudulent drivers and/or passengers on the basis of Article 6(1.)(f) GDPR to protect your and our interests (e.g. protection against overpayments).

2.4 Bug fixing, customer services and improvement of functionality

To make it possible to eliminate malfunctions in the TaxiMe App, to answer specific customer inquiries about functionality or the hailing services and to adapt the TaxiMe App to the needs of passengers, the following personal data is processed for the performance of the contract in accordance with Article 6(1.)(b) GDPR:

- First and last name (if provided), email address (if provided), mobile phone number (if provided), your GPS location data at the time of booking, start and destination coordinates of your ride, and information about your device (device ID).

If sufficient for the purpose, we work with data rendered anonymous or aggregated data rather than personal data.

2.5 a) News and personalised offers

You will receive offers and advertising from us if you have agreed to receive news and personalised offers (advertising, vouchers and promotions) and to the display of usage-based advertising ('retargeting') during the registration process or subsequently in the menu of the TaxiMe App and have operated the toggle accordingly. This concerns non-personalised (sent to all customers) and personalised (sent only to you and based on an analysis of the TaxiMe App usage frequency) newsletters sent electronically (email, in-app messages, push messages) to your device. To send you personalised advertising, we will process your usage data. Usage data are information about the number of app installations, registrations and taxi rides. Based on this data, you will then receive special offers and advertising from us.

In this context, we will process the following personal data in accordance with Article 6(1.)(a) GDPR:

- First and last name, passenger ID, email address, registration date, TaxiMe App version, your GPS location data at the time of booking and at the end of the taxi ride, device ID, IDFA (Ad-ID, Apple, identifier for advertisers), GAID (Google advertising identifier), and usage data (usage frequency, information about the number of app installations, registrations and taxi rides), language, and city.

You confirm that you are 16 years old or older when you give your consent.

If you do not wish to receive the news and personalised offers already discussed, you can – just as easily as when you agreed to it – withdraw your consent by operating the toggle discussed above accordingly. Of course, you can also contact us by sending an email to gdpr@taxime.to.

Please note that the withdrawal and ensuing changes are valid only for the future and will be effective or implemented by no later than 30 days from withdrawal.

2.5 b) Facebook Custom Audiences

In order to be able to display individually targeted advertisements about our services within the Facebook social network, a service of Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland, and on Facebook partner sites, we work with Facebook Custom Audiences. We do this so that advertisements (e.g. banners) can be tailored exactly to the possible needs of the customer. The basis of this is a marking process, wherein the Ad-ID (IDFA or GAID) from the customer's end device (e.g. smartphone) is sent automatically or manually to Facebook via a certain interface with the involvement of a service provider selected by TaxiMe. TaxiMe then creates a list of customers who have carried out certain actions with the TaxiMe App. Only certain pre-defined actions can be selected (e.g. installation of the TaxiMe App in the last 30 days). Finally, Facebook compares the customers' Ad-ID with the Ad-ID of people with a Facebook profile, defines certain groups (e.g. group 1: installation in the last 30 days) and displays corresponding advertisements to these groups. Customers who are not also users of Facebook cannot be compared by Facebook and advertising is not displayed to them.

You confirm that you are 16 years old or older when you give your consent.

If you do not wish to receive advertising in the context of Facebook Custom Audiences, you can – just as easily as when you agreed to it – withdraw your consent by operating the toggle discussed above accordingly. Of course, you can also contact us by sending an email to gdpr@taxime.to.

Please note that the withdrawal and ensuing changes are valid only for the future and will be effective or implemented by no later than 30 days from withdrawal.

2.5 c) Newsletter

If you provide us with your email by either a) creating an account via the TaxiMe App and choosing to be notified about useful promotions and discounts or by b) subscribing for our newsletter on our website (<https://taxime.to>), we will email you our newsletter containing useful information like discounts and promotions. In this context we process pursuant to Art. 6 (1) f) GDPR the following personal data: e-mail. You may revoke to direct marketing by clicking on a link at the end of an email (e.g. Opt out from newsletter) with effect for the future. Please note that the withdrawal and ensuing changes are valid only for the future and will be effective or implemented by no later than 30 days from withdrawal. This is for reasons of a technical nature, which do not permit faster implementation.

2.6 Google Maps

The TaxiMe App makes use of the Google Maps API. This enables us to display maps in your TaxiMe App and you to use those maps. Our TaxiMe App cannot function without the Google Maps API. You can view Google's terms of use at <https://policies.google.com/terms?hl=en>. Additional terms of use for Google Maps are available at https://www.google.com/help/terms_maps.html. Google's privacy policy is available at <https://policies.google.com/privacy?hl=en>. After you have given your approval via your operating system, we use Google Maps to calculate the estimated fare for your ride and show you the distance of the taxi you have booked interactively. This involves us processing your GPS location data in accordance with Article 6(1.) (b) GDPR. We render your GPS location data anonymous before forwarding it to Google. Identification of you personally is ruled out.

2.7 Rating drivers

You can rate drivers via the TaxiMe App. When you submit a rating, it is assigned to a specific ride and considered in the average rating of the driver and vehicle in question. It does not involve transmitting personal data to the driver.

3. Provider of processing services and processing in countries outside the European Economic Area

In some cases, we arrange for external service providers to process your data (e.g. troubleshooting, creation of mailings). This makes it necessary for us to transmit your personal data to our external service providers for a specified purpose (confined to the purpose in question). We have selected our service providers carefully. We have obtained information about their technical and organisational measures for the secure processing of personal data. We also require that our service providers comply with the applicable data protection regulations. We work with service providers from the EU and other EEA countries.

We store all our data with a cloud service provider within the EU or in IT infrastructures and systems (employee computers) at our sites within the EU.

We work with IT service providers that facilitate the ride-hailing services in accordance with point 2.1, as well as the fault elimination, customer services and improvement of functionality in accordance with point 2.3. We also work with payment service providers that facilitate payment processing in accordance with point 2.2. If you have agreed to receive news and personalised offers (point 2.5), then we work with marketing agencies and service providers. Please do not hesitate to contact us at gdpr@taxime.to if you would like to know more about the service providers we engage.

We do not sell personal data to third parties.

However, we do reserve the right to disclose information about you if we are legally obliged to or if we are required to surrender it by administrative or law enforcement bodies (e.g. police or public prosecutors).

4. Your rights

You have the right to request information from us at any time about your personal data we have stored and the origin, recipients or categories of recipients to whom these data are forwarded or otherwise disclosed, the purpose of the storage and processing, the planned storage period, our automated decision-making procedure, the right to data portability, the existence of a right to rectification, erasure, restriction of or objection to processing, and any existing right to lodge a complaint with a supervisory authority.

You also have the right to rectification of incorrect data and, in cases where the legal requirements are met, to blocking and erasure, as well as to restrict the processing of data.

You may also send requests for information, withdrawals of consent, objections and other concerns regarding data processing by email to gdpr@taxime.to.

5. Data security

We have taken appropriate technical and organisational measures to guarantee data security, in particular to protect your personal data against access by third parties, as well as accidental or intentional modification, loss or destruction. Such measures are reviewed periodically and adapted in line with the state of the art. The transfer of your personal data from your device (e.g. smartphone) to us is always encrypted.

6. Storage period

In principle, we process and store your data for the duration of our contractual relationship. In addition, we are subject to various retention and documentation requirements. The required periods, e.g. from tax law, can be up to 10 years. Moreover, special statutory provisions can make a longer retention period necessary, e.g. evidence in the context of statutory periods of limitation.

If data is no longer required for compliance with contractual or statutory requirements, they are regularly deleted, unless their limited further processing is necessary for the purposes listed above.

7. Obtaining access to, removing, or changing information you provide

Users may review, update, or correct their Personal Information (PI) via a written request to the dedicated email address gdpr@taxime.to.

Users may, to the extent permitted by law, request the deletion of their PI, unless we are required to retain such information by law. This can be done if User would like to access the PI we have collected online from him/her, correct errors in such PI, request to have the PI deleted or no longer collected or maintained. We reserve the right to verify the identity of any person making an opt-out or correct/update request, but shall have no liability whatsoever resulting from false or erroneous requests.

We may in Our discretion delete any information provided by a User or related to a User, pursuant to Our policies as then in effect, to the extent permitted by applicable law.

