

eCooltra Privacy Policy for Registered Users

The service of temporary rental of electric motorcycles (the "Service") is provided by the company **COOLTRA MOTOSHARING, S.L.U** (hereinafter "eCooltra") with a registered office in **C / REINA CRISTINA, Nº 2, 2º, 2ª, 08008, BARCELONA and Tax Identification Number B- 65874877**. Locally, the subsidiaries of eCooltra provide the rental Service and formalise the rental contracts. They are listed in Annex 1 of the General Conditions of use of the Service.

This Privacy Policy applies to the processing of User data by eCooltra and its Local Subsidiaries.

For each city in which eCooltra operates, the Service will be locally provided by a Local Subsidiary of eCooltra, to whom the User's data will be communicated, which is necessary to provide the service and to process the corresponding billing. For each Local Subsidiary, the additional Privacy conditions indicated in section G below will apply to the processing of your User data.

On the other hand, this Privacy Policy is also complemented by the eCooltra CONDITIONS OF USE which are available on https://cooltrasftp.ecooltra.com/TERMS_CONDITIONS/TERMS_CONDITIONS_EN.pdf

eCooltra and its Local Subsidiaries guarantee the protection of all personal data that the User provides during the registration and use of the Service and, in compliance with the provisions of Legislation in force regarding the Protection of Personal Data and especially in REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of April 27, 2016:

A) Files: All personal data provided by the User and / or collected by eCooltra through the registration and use of the Service will be incorporated into one or more files created by eCooltra and kept under its responsibility, which will be duly notified to the Spanish Data Protection Agency.

B) Collected and processed data: eCooltra collects the following personal information:

1) **REGISTRATION:** When registering as a user, eCooltra collects the following information: name, surname, e-mail, residence address, billing address, telephone number, ID or passport, driving license, debit / credit card.

2) USE OF THE SERVICE: during the use of the service by the user, eCooltra collects the following data: date, time and place of start of the rental, date, time and place of completion of the rental, route, actions performed with the vehicle sensors (seat, stand, switch on /switch off / pause).

3) COMMUNICATIONS / CLAIMS: any other particular data communicated by the Users in the course of their communications with eCooltra in order to establish contact or resolve any claim with eCooltra.

Although there is no option to include information through text, the user is allowed to share opinions. Opinions are welcome, but the PLATFORM / APP expressly vetoes that the following information can be disseminated:

- the personal contact data of third parties (phone number, email address, bank details, etc.),
- purposes of a discriminatory, injurious, violent nature or that suppose or incite the commission of a crime.

When the user wants to share hypertext links or equivalent to other websites or content of third parties, you must ensure, under your full responsibility, that they are not violating Intellectual Property rights.

Consent. The User, when proceeding to the registration, authorizes and consents that his personal data will apply to the terms indicated above, marking the acceptance box that is found at the end of each User registration form. The User certifies that he is over 18 years of age and that he therefore possesses the necessary legal capacity to provide unequivocal consent regarding the processing of his personal data and all this, in accordance with the provisions of this Privacy Policy.

C) Purposes. Your personal data are collected for the following purposes:

- Managing rental requests and providing Customers with the necessary tools for the enjoyment of the Service.
- Comply with the legal, accounting, tax, administrative and contractual obligations related to the provision of the services requested.
- Processing Service payments through the payment gateway of the Service.
- Prepare measures to protect against credit risk, including activities aimed at identifying the client / user, as well as their economic purpose.
- Providing information to Users about the products and services marketed by eCooltra.
- Analysing, improving and optimising the use of the Service. As well as providing a device that allows the collection and registration of information related to the driving of the motor vehicle by its drivers, as well as to support the kinematic reconstruction of claims.

- Prepare a geolocation system for motor vehicles and measures to protect the property of the eCooltra fleet, in order to protect eCooltra from any act carried out by third parties and / or illegal or fraudulent customers.
- Resolving complaints, incidents or queries through the channels enabled for this purpose: Contact Form, Online Chat, email and customer service telephone.
- Providing Users with commercial information about offers and promotions launched by eCooltra, which may be of interest to Users (unless they have objected to it by online indications or sending an e-mail to info@ecooltra.com with the subject "unsubscribe from newsletter"). The sectors that we may inform Users about are as follows: all kinds of transport, tourism and travel, renewable energy, IT and new technologies, food, leisure, training and education, editorial, financing and credit, insurance, legal assistance, childcare, telecommunications, automotive, consumer products, health and pharmaceutical products, personal care, electronics, water, energy, lottery and gambling, real estate, toys, textiles and NGOs.

eCooltra will not use in any case the personal data provided by the User / Customer to offer services other than those mentioned or, if applicable, to achieve a private profit other than the authorised by the data holder.

D) Cancellation of the User Account. The user may, at any time, delete his account and the data associated with it. In these cases, eCooltra undertakes not to use said information beyond the blocking obligations imposed by the Legislation regarding Data Protection and the LSSICE. The user can also unsubscribe at any time from the payment services, which does not imply that he is cancelling his user account. The withdrawal of payment services and the cancellation of the account, as well as the cancellation of the Newsletter, are independent withdrawal processes, which have specific forms enabled for this purpose.

E) Data conservation. eCooltra will keep the user's data for use exclusively for the duration of the contractual relationship. The duration of the relationship is indefinite. As stated in section E, once the user cancels the account, eCooltra undertakes not to use said information beyond the blocking obligations that the Legislation in Data Protection and the LSSICE interpose.

F) Confidentiality: eCooltra is committed to keep utmost discretion, confidentiality and secrecy on the private and personal information that it can have access to. eCooltra implements the technical and organisational security measures established by data protection regulations, depending on the type of data processed in each case. In the collection and processing of personal data, adequate security measures have been taken to prevent loss, unauthorised access or manipulation, in accordance with, in accordance with what is established in the regulations.

In compliance with the provisions of REGULATIONS (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of April 27, 2016 and the rest of the current regulations on data protection, ECOOLTRA as

responsible for the files / s, informs that the personal data that the user will provide throughout his / her relationship with our company, including his / her e-mail address and all personal data that we can access during the established relationship, will be treated in a duly registered file (s). in the Spanish Agency for Data Protection and in accordance with the provisions of current legislation.

G) Assignments: eCooltra will transfer the User data indicated in section (B) to:

- The Subsidiary / s / Local of eCooltra (entities indicated in Annex 1 of the General Conditions of Service) for the purposes indicated in section (C), and in particular for booking, rental, management and local provision of the eCooltra Vehicle Rental Service and for the issuance of invoices and the communication of offers and other local promotions.
- The insurance companies involved in an accident whose affected is an eCooltra vehicle.
- Companies specialized in the collection of debts
- Companies specialized in the management of commercial information.
- Companies dedicated to the rental of vehicles and / or auxiliary services with which eCooltra has agreements.
- Companies linked contractually with eCooltra that carry out the claims management.

Except for the above, no other cessions of data are foreseen, more than those legally established by other legislations or competent public administrations. Likewise, the data may be transferred in the case of the purchase of all or substantially all the assets of eCooltra, or the reorganization of the business group of eCooltra. This transfer of data will be carried out under strict compliance with the provisions of current regulations on data protection.

H) Rights of the Interested Party. The User can, at any time, exercise the rights of access, rectification, portability, cancellation, opposition, limitation, forgetting or revocation of the consent granted on the processing of their personal data, sending to eCooltra a signed letter to our postal address, above, where your contact details are clearly stated, to which you must attach a photocopy of your ID Card / Passport or document that proves your identity or you can send it to the following email address: rgpd@ecooltra.com.

The information that can be sent to us will be incorporated into the information systems of **eCooltra**.

I) Social Networks. We inform you that eCooltra has presence in social networks. The treatment of the data that is carried out of people who become followers in social networks (and / or perform any link or connection action through social networks) of the official pages of eCooltra will be governed by this section, as

well as for those conditions of use, privacy policies and access regulations that belong to the social network that is appropriate in each case and previously accepted by the user.

eCooltra will treat your data with the purpose of correctly managing your presence in the social network, informing you of activities, products or services of eCooltra, as well as for any other purpose that the regulations of the Social Networks allow.

The publication of contents is prohibited:

- That they are allegedly unlawful by national, community or international regulations or that they carry out activities that are allegedly unlawful or contravene the principles of good faith.
- That threaten the fundamental rights of people, lack of courtesy in the network, annoy or may generate negative opinions in our users or third parties and in general whatever the content that eCooltra deems inappropriate.
- And in general, that contravene the principles of legality, honesty, responsibility, protection of human dignity, protection of minors, protection of public order, protection of privacy, consumer protection and intellectual and industrial property rights.

Likewise, eCooltra reserves the right to remove, without notice from the website or the corporate social network, those contents that deemed inappropriate.

Communications sent through social networks will be incorporated into a file owned by eCooltra and may send you information of interest.

At any time, you can exercise the rights of access, rectification, opposition, limitation and, where appropriate, portability or cancellation, communicating in writing and indicating your personal data to the address rgpd@ecooltra.com.

In any case, if you send personal information through the social network, eCooltra will be exempt from liability in relation to the security measures applicable to this platform, and the user should, in case of wanting to know them, consult the corresponding specific conditions of the network in question.

J) Means of communication enabled. The only means of communication enabled between eCooltra and the User are: landline, corporate mobile phones, corporate mail, registered office and newsletter and other social networks.

If you send personal information through a means of communication other than those indicated in this section, the COMPANY will be exempt from liability in relation to the security measures available to the medium in question.

K) Communications and Notifications. Any communication sent will be incorporated into the information systems of eCooltra. By accepting these conditions, terms and policies and by sending the User their personal data to eCooltra, the User expressly consents to eCooltra carrying out the following activities and / or actions, unless the User indicates otherwise to contract or subscribe any eCooltra product and / or services or because of a subsequent revocation of the consent initially granted.

- The sending of commercial and / or promotional communications on paper informing the Users of the activities, services, promotions, advertising, news, offers and other information about the services and products related to the activity and provision of eCooltra services.
- If the User has expressly consented to the sending of commercial communications electronically by subscribing the NEWSLETTER, the sending of such communications by electronic means informing the Users of the activities, services, promotions, advertising, news, offers and other information about eCooltra's services and products that are the same or similar to those that were originally the object of contract or interest by the User.
- The conservation of the data during the periods provided in the applicable provisions.

L) Selection of personnel. In compliance with the provisions of Regulation (EU) 2016/679 of April 27, 2016 (RGPD), we inform you that the personal information provided will be processed by eCooltra, with address at Calle de la Reina Cristina, 2, 2-2, 08003, Barcelona, Spain. (Responsible for the Treatment).

The data provided will be treated with the sole purpose of involving the interested party in the recruitment processes currently open or for future processes in which the candidate can fit, not being used for other purposes. In case of any change in your data, please inform us in writing as soon as possible, to keep the data properly updated. They will not be communicated to third parties, except by legal obligation.

The data will be kept for a maximum period of six (6) months, after which it will proceed to the deletion of these guaranteeing a total respect for confidentiality both in the treatment and in its subsequent destruction.

Likewise, we inform you that you have the right to request access, rectification, portability and deletion of your data and the limitation and opposition or by sending an email to rgpd@ecooltra.com, indicating the type of right you want to exercise and accompanying your request of a copy of your ID or similar document in law. If

you consider that the processing of personal data does not comply with current regulations, you also have the right to file a claim with the Control www.agpd.es.

M) Cookies policy.

What are cookies?

Cookies are small data files that are received from the visited website and are used to record certain interactions of the navigation on a website by storing data that can be updated and recovered. These files are stored on the user's computer and contain anonymous data that is not harmful to your computer. They are used to remember the user's preferences, such as the selected language, access data or personalization of the page. Cookies can also be used to record anonymous information about how a visitor uses a site. For example, from which Web page you have accessed, or if you have used an advertising "banner" to arrive.

Why do we use cookies?

eCooltra uses strictly necessary and essential cookies for you to use our websites and allow you to move freely, use secure areas, personalized options, etc. In addition, eCooltra uses cookies that collect data related to the analysis of use of the Web. These are used to help improve customer service, measuring the use and performance of the page, to optimize and customize it.

Our sites can also have social network links (such as Facebook or Twitter). eCooltra does not control the cookies used by these external websites. For more information about cookies from social networks or other third-party websites, we advise you to review your own cookie policies.

What different types of cookies do we have?

Session Cookies: Session cookies are those that last if the user is browsing the website and are deleted at the end.

Persistent cookies: These cookies are stored in the user's terminal for a longer time, thus facilitating the control of the preferences chosen without having to repeat certain parameters every time you visit the website.

Own cookies: They are cookies created by this website and can only read the site itself. For example: technical cookies for loading images, cookies for customizing web parameters, traffic analysis cookies, etc. **Third party**

cookies: They are cookies created by third parties and we use them for different services (e.g. web site analysis or advertising).

According to its purpose:

Technical cookies: Technical cookies are those essential and strictly necessary for the proper functioning of a Web portal and the use of the different options and services offered. For example, those that serve for the maintenance of the session, the management of response time, performance or validation of options, use security elements, share content with social networks, etc.

Personalization cookies: These cookies allow the user to specify or customize some characteristics of the general options of the Web page, for example, to define the language, regional configuration or browser type.

Analytical cookies: Analytical cookies are those used by our website, to develop navigation profiles and to know the preferences of users of this to improve the supply of products and services. For example, an analytical cookie would control the geographical areas of greatest interest to a user, which is the most widely accepted product, etc.

Advertising cookies: Advertising cookies allow the management of advertising spaces based on specific criteria. For example, the frequency of access, the edited content, etc. Advertising cookies allow through the management of advertising to store behavioural information through the observation of habits, studying access and forming a profile of user preferences, to offer advertising related to the interests of their profile.

How can I change the configuration of cookies?

[Internet Explorer cookie settings](#)

[Firefox cookie settings](#)

[Google Chrome cookie settings](#)

[Safari cookie settings](#)

Cookies Flash configuration:

These browsers are subject to updates or modifications, so we cannot guarantee that they comply fully with the version of your browser. It may also be that you use another browser not included in these links such as Konqueror, Arora, Flock, etc. To avoid these imbalances, you can access directly from the options of your browser that is usually found in the Options menu, in the "Privacy" section. (Please check your browser's help for more information.)

Revocation of consent

It is also possible to limit how third-party websites install cookies on your computer, to avoid data collection and registration of your browsing activity. To limit the use of third-party cookies you can go to the configuration website or OptOut:

Google Analytics

DoubleClick

Google

Flash Cookies YouTube

Select the option "Delete all sites" or select the specific web you wish to delete and "Remove Website". Please note that, if you reject or delete the web browsing cookies, we will not be able to maintain your preferences, some features of the pages will not be operative, we will not be able to offer you personalized services and every time you browse our website we will have to ask you again your authorization for the use of cookies.

If you still decide to modify the configuration of your access to the web page, you should know that it is possible to eliminate cookies or prevent this information from being registered on your computer at any time by modifying the configuration parameters of your browser.

Where can I get more information?

You can find more information about cookies at www.allaboutcookies.org or www.youronlinechoices.eu

N) Geolocation. All motor vehicles used for the service provided by eCooltra, will be geolocated by GPS signal, in order to correctly provide the service, and will allow traceability at any time by eCooltra, which will result in the collection and processing of some personal information related to the client. These data will be used only for the correct provision of the service, for statistical purposes and / or at the request of public authorities.

O) International Data Transfer. eCooltra does not carry out the International transfer of the Users' data.

P) DPO. eCooltra has an accredited DPO, the Auris Advocats office (www.aurisadvocats.com)