

Privacy Policy Passenger

Spain

Privacy Notices for Passengers in accordance with the EU General Data Protection Regulation ("GDPR") for Users of the FIJOTAXI Passenger App

Version: December 2020

The information provided below gives you an overview of our Processing of your Personal Data and your rights pursuant to data protection regulations in connection with the usage of our app's ride-hailing service for passengers ("FIJOTAXI Passenger App").

Which Personal Data is processed is substantively determined based on the services or products you use.

Table of Contents

1. Information Regarding the Data Controller
2. Definitions
3. Data Processing Processes and Purposes
4. Data Exchange within the FIJOTAXI Group
5. Provider of Processing Service and Processing Outside of European Economic Area Countries
6. Your Rights
7. Data Security

8. Data Storage

9. Updates and Changes

1. Information Regarding the Data Controller

For passengers in the territory of Spain, the data controller as per Art. 4 No. 7 GDPR is:

FIJOTAXI S.L. ("FIJOTAXI ")

C/Juan de Celaya 20,

46017 Valencia

E-Mail: fjotaxi@gmail.com

The data controller has a data protection officer. You can reach our data protection officer most easily by e-mailing: fjotaxi@gmail.com or by writing to the foregoing address with the subject "The Data Protection Officer."

2. Definitions

"Personal Data" is all information which relates to an identified or identifiable natural person. This includes, e.g., items like the name, postal address, e-mail address or telephone number, but also usage data like your IP address.

“Processing“ is every process carried out with or without automated assistance or every sequence of such processes in connection with Personal Data, e.g. obtaining, capturing, organizing, ordering, saving, adjusting or modifying, sorting, accessing, using, disclosing by transmission, distributing or any other form of making available, comparing or connecting, limiting, deleting or destroying.

3. Data Processing Activities and Purposes

In the following, we will inform you about the various types of Personal Data we process and for what purpose. The FIJOTAXI Passenger App makes it possible for you to procure Journeys through us both with Taxis and with Private Hire Vehicles. For the use of our FIJOTAXI Passenger App for procurement of Journeys, you must provide Personal Data which we process in order to perform the respective service. If additional information can be voluntarily shared, these are indicated as being “optional“.

3.1 Journey Procurement

In connection with the procurement service, pursuant to Art. 6 (1) b) GDPR, for the purpose of performing our procurement contract with you, and pursuant to Art. 6 (1) a) GDPR as it relates to optional information, the following Personal Data is processed:

3.1.1 General

You must provide the following information to register for the use of the FIJOTAXI Passenger App:

first name, surname, e-mail address and mobile phone number (basic data). In the context of the procurement of Journeys, we will also process the following data: the time of the booking, the starting and destination coordinates of your Journey and information pertaining to your end user device (Device ID). The starting coordinates can be provided by you (i) manually by placing a pin on the map or, as it may be, inputting an address, or (ii) by transmitting your GPS coordinates. The legal basis for the Processing of your GPS location data is in Art. 6 (1) a) GDPR. The usage of your GPS location data by FIJOTAXI can be consented to upon installing the FIJOTAXI Passenger App. Via the operating system of your end user device (smartphone, tablet, etc.), you can also consent to the usage of your GPS coordinates by FIJOTAXI at a later point in time or withdraw your consent . In principle, Processing of your GPS coordinates only

occurs if you are logged in and the FIJOTAXI Passenger App is an active app which is open and in use in the frontend.

Without Processing the foregoing Personal Data, we cannot procure a Journey for you with a Transportation vehicle or company. This does not apply in as much as it relates to optional disclosures.

Profile picture, workplace and home address are likewise optional disclosures and will only be collected and processed by us if you provide us with this information either at the time of registration or thereafter. We use your profile picture in order to identify you and to avoid fraud situations. To this end, the respective Driver who is carrying out your Journey will temporarily be shown your profile picture (see on this point also cl. 2.1). The workplace and home address serve to make it easier to save standard routes used by you. The Processing of these voluntarily provided Personal Data occurs on the basis of your consent in accordance with Art. 6 (1) a) GDPR. If you no longer wish your optionally disclosed data to be processed, you can simply delete it from the FIJOTAXI Passenger App.

The respective Transportation Company and the Driver who carries out the Journey you have booked will receive your pickup location along with your name and, in as much as it is provided by you, your destination and your profile picture, which shall be used for identification purposes. An identification can also be carried out by the Driver asking you for your name before the beginning of the Journey. After a successful procurement of a Journey for you, the respective Driver can call you via the FIJOTAXI Passenger App. In the course of this, the mobile phone number you provided during registration will be shown. In this way, you can be informed regarding potential delays (e.g. traffic jams) by the Driver and, for example, details regarding the pickup location can be clarified. After ending the Journey, the Driver is no longer able to access your personal information in his FIJOTAXI driver app.

The legal basis for the transmission of the pickup and destination locations as well as the name and mobile phone number to the respective Transportation Company is Art.6 (1) b) GDPR and, with respect to the optional information such as the profile picture or, as it may be, GPS data, Art. 6 (1) a) GDPR.

3.1.2 Registration/Logging In via Facebook Connect

Furthermore, we offer you the option to log in or to register with the FIJOTAXI Passenger App using your Facebook user data from the Facebook social network, a service of Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland ("Facebook"). To this end, you must activate the Facebook Connect Button. For the purpose of logging in, you will be transferred to the Facebook website, where Facebook will request certain permissions and you will be able to log in using your Facebook user data. In this way, your Facebook profile and our FIJOTAXI Passenger App will be linked. Through this linkage, your data (first name, surname, e-mail address, profile picture) as provided to Facebook will become visible to us. The Processing of this data by us will occur in accordance with the determinations in this privacy policy.

Further information regarding Facebook Connect and privacy settings can be found in the privacy policy and terms of use of Facebook at: www.facebook.com/policy.php.

If you do not wish for your data to be processed as above, you cannot use the Facebook Connect function. If you have used Facebook Connect in the past, you can prevent the further Processing of your data as saved with Facebook by us if you go to 'settings' in your Facebook account and delete the FIJOTAXI Passenger App from the 'Apps and Websites' category.

3.1.3 Registration/Logging In via Google Account

Also, we offer you the option to log in or to register with the FIJOTAXI Passenger App using the login data of your Google Account at Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA („Google"). To this end, you will be transferred to the website of Google, where Google will request certain permissions and you will be able to log in using your Google login data. In this way, your Google profile and our FIJOTAXI Passenger App will be linked. Through this linkage, the information you have provided Google (first name and surname, e-mail address and profile picture) will become visible to us. The Processing of this data by us will occur in accordance with the determinations in this privacy policy.

Further information regarding logging in and registering via Google and regarding the privacy settings of Google can be found in the privacy policy and the terms of use of Google at <https://policies.google.com/privacy?hl=de>.

If you do not wish this, please do not use logging in or registration via Google account. The further Processing of your foregoing data which are saved in your Google account by us can be prevented by going to 'security' in your Google account and, there, selecting 'third party apps with account access', followed by the option 'manage third party access', whereupon the access rights of FIJOTAXI Passenger App can be removed.

3.1.4 Integration of Google Maps

The FIJOTAXI Passenger App uses the Google Maps API which is provided by Google Ireland Limited Gordon House, Barrow Street Dublin 4 ("Google"). In this way, you can be shown maps in the FIJOTAXI Passenger App and you can also have the ability to interact with said maps. Without the Google Maps API application, FIJOTAXI Passenger App will not function. The terms of use for Google Maps can be found at: https://www.google.com/help/terms_maps.html. There, you will also find a notice regarding the privacy policy of Google: <https://policies.google.com/privacy?hl=de>. We use Google Maps in order to calculate the anticipated cost of your Journey and in order to interactively show you the distance to the vehicle which will be carrying out your Journey. In this context, if you have consented to such usage, your GPS location data will be processed pursuant to Art. 6 (1) a) GDPR. Your GPS location data will only be provided to Google in an anonymized form. An identification of your person is impossible.

3.2 Payment

If you use the Pay By App function, the following Personal Data will be processed by us on the basis of Art. 6 (1) b) GDPR for the purpose of performing the contract:

First name and surname, start location and destination location of your Journey, country, language, e-mail address, mobile phone number. If you have provided a credit card as a means of payment, the first name and surname of the credit card owner, the issuer of the credit card and the first six and last four digits of the credit card number and the expiration date of the credit card; in the case of PayPal, the e-mail address of your PayPal account and the information pertaining to your end user device (Device ID, etc.).

The payment data provided by you are, in the course of this, transmitted to our payment processors. We utilize multiple payment processors so that, in the event of one suffering an outage, we can continue to support the payment method offered by us.

If you use the offered payment methods via PayPal, the data necessary to carry out the processing of the payment will be transmitted to PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg (hereinafter: "PayPal"). Further information regarding data Processing by PayPal can be found under:

<https://www.paypal.com/de/webapps/mpp/ua/privacy-full>.

Credit card payments are performed by the following service providers: (i) the Braintree service of PayPal Inc., 22-24 Boulevard Royal, L-2449, Luxembourg, to which end we will transmit your data to PayPal. The privacy policy for the use of the Braintree service can be found at:

<https://www.braintreepayments.com/legal>. (ii) Wirecard AG, Einsteinring 35, 85609 Aschheim, Germany. For payments via WireCard, the payment data provided by you will be transmitted to Wirecard. Extensive information regarding data protection at Wirecard can be found here: <https://www.wirecard.de/datenschutz/>.

All payments service providers are PCI DSS certified (Payment Card Industry Data Security Standard). In providing your credit card data, these will be transmitted via an encrypted connection directly to the payments processor utilized by us. Our payments processor will subsequently carry out a so-called authentication of your means of payment by reserving an amount (0.50 EUR) on your account. This ensures that your means of payment is an active means of payment. For security reasons, only the first six and the last four numbers of your credit card are transmitted to us which we save for the purposes of identification and record keeping.

3.2.1 Payment Service Directive

The new regulation on the Payment Services Directive 2 (PSD2) will enter into force. The aim is to standardize security rules and decrease fraud for cashless payments throughout the European Economic Area through the newly required "Strong Customer Authentication" (SCA). This regulation implements a uniform EEA-wide legal framework for the amounts and intervals in which the authentication is required.

Two out of three possible authentication factors must be validated:

- 1) Something you know, such as a password or PIN.
- 2) Something you have, such as a credit card or device.
- 3) Something you are. For example Iris pattern, fingerprints or other biometric data.

The selection of the respective authentication methods is the responsibility of the issuing bank.

3.3 Rating of Drivers and Passengers

Via the FIJOTAXI Passenger App, you can provide public ratings of Drivers and vehicles. If you provide a rating, it will be associated with a particular Journey and taken into account in the context of the average evaluation of the corresponding Driver and vehicle. None of your Personal Data will be transmitted to the Driver. The Processing of Personal Data by FIJOTAXI is carried out on the basis of your consent as per Art. 6 (1) GDPR, which you provide by offering a rating.

Beyond this, the respective Driver has the possibility to rate you positively as a passenger, but also to inform us regarding problems. The rating in terms of stars ranges from one to five stars, whereby five is the highest point value. The Drivers are urged to support their rating on the basis of the politeness and behavior of the passenger. The ratings are only viewable to FIJOTAXI. The Processing of this data takes place on the basis of our legitimate interest pursuant to Art. 6 (1) f) GDPR in further developing and improving the quality of our services.

3.4 Fraud Prevention and Non-Payment

3.4.1 General

Since FIJOTAXI is subject to the risk of non-payment in case of non-payment relating to payments with credit cards or the Pay By App function, pursuant to Art. 6 (1) f), 22 (2) a) GDPR FIJOTAXI will, following your registration in the app, conduct an evaluation of the risk of non-payment for each newly entered means of payment and for each booked Journey on the basis of a mathematical-statistical model (Scoring).

To determine the value, the following Personal Data will be processed:

First name and surname, first address at registration, invoice address (if provided), starting location and destination location of your Journey, mobile phone number, language, country, e-mail address, credit card issuer, the last four digits of your credit card number, the expiration date of your credit card, the name of the credit card owner, as necessary the e-mail address of your PayPal account, information regarding your end user device (Device ID) and the version of the FIJOTAXI Passenger App.

Under the first address at registration, it is understood that this is the address from which you register for FIJOTAXI Passenger App for the first time. The acquisition of addresses, in particular your residential address, is not intended. However, an unintentional use of addresses may occur if your first address at registration is your residential address, in other words if you register from home, or if the invoice address you have provided is, as it may be, identical with your residential address. On the basis of this information, our European fraud prevention service provider will calculate a statistical likelihood of non-payment and, on the basis of the same, will generate a fully automatic decision as to whether you will be offered the Pay By App function in the FIJOTAXI Passenger App. The invoice address and the first address at registration along with the other, foregoing Personal Data will be used for the calculation of the score value, but a further Processing or use of these Personal Data will not occur. The procurement function of the App without the Pay By App function is available to every user, independent of score value. If the fully automatic decision on the basis of the score value leads to you not being offered the Pay By App function, you can still use the FIJOTAXI Passenger App and make payments either in cash or using an EC card. In this case, you will in any case be informed without undue delay regarding this decision by an e-mail to the effect that you will not be able to use the Pay By App function. If you do not accept this decision regarding the execution of the Pay By App function, please contact fijotaxi@gmail.com. We will then once again evaluate the decision while taking your viewpoint into account using a specially trained employee.

In individual cases, a specially trained FIJOTAXI employee will conduct the final decision regarding the execution of the Pay By App function in connection with the scoring. In these cases, the decision therefore is not performed in a fully automated manner.

Independent of the fully automated calculation of the score value, we use the foregoing listed Personal Data for the purpose of preventing non-payment by using our own, specially trained employees pursuant to Art. 6 (1) f) GDPR. This means that a specially trained FIJOTAXI employee will evaluate the data and, on this basis and in case of irregularities, make a final decision based on his or her own discretion and experience as to whether or not you will be offered the Pay By App function in the app. Furthermore, this employee can in such cases, as it may be, also call a Driver during a Journey and inform the same regarding the non-acceptance of a means of payment. A use of your Personal Data going beyond this will not occur. If the decision of our employee should lead to you not being offered the Pay By App function, you can still use the FIJOTAXI Passenger App and make payments in cash or with an EC card. We notify you of the fact that you can use the FIJOTAXI Passenger App and our procurement service any time, even if the Pay By App function has been deactivated.

In order to protect you against overpaying for Journeys, the mobile phone of the Driver will transmit, during the Journey, in short intervals, GPS coordinates to us which will allow us to reconstruct the entire Journey. We wish to ensure that the Driver does not intentionally prolong the Journey in order to obtain a higher compensation. If you are of the opinion that you have paid too much, you can make a request with us regarding the route of a Journey. The Processing of GPS coordinates is carried out on the basis of Art. 6 (1) (f) GDPR, to protect your and our interests (e.g. protection against overpayment) and inasmuch as this for the purpose of your and our protection against fraudulent Drivers and/or passengers.

3.5 Bug Fixing and Functionality Improvements

In order to fix bugs in the FIJOTAXI Passenger App and to improve functionality of the FIJOTAXI Passenger App and to adjust it to suit the needs of passengers, we process the following Personal Data pursuant to Art. 6 (1) f) GDPR on the basis of our legitimate interest:

First name and surname, e-mail address, country, mobile phone number, profile photo (optional input), your GPS coordinates in the moment of booking (insofar as you have permitted access), workplace and home addresses (optional inputs), start location and destination location of your

Journey and information regarding your end user device (Device ID, Ad ID), language and time zone.

In so far as it is sufficient for the fulfillment of the corresponding purpose, we work with anonymous data rather than with Personal Data.

3.6 News & Personalized Offers

3.6.1 General

If, in the context of the registration process or later in the profile of the FIJOTAXI Passenger App under the rubric “Privacy“, consent is given to receive news & personalized offers (advertising, coupons and special offers) and to show usage-based advertising (“Retargeting“), and the correspondingly placed toggle has been activated, you will receive offers and advertising from us, and also for products and services of other companies of the FIJOTAXI Group. In this respect, your end user device (smartphone, tablet, PC, etc.) will receive personalized advertisements via electronic post (e-mail, SMS, MMS) or by other electronic means (via in-app messages, push messages).

In connection with this, we process the following Personal Data pursuant to Art. 6 (1) a) GDPR, insofar as you have given us the corresponding consent:

First name and surname, passenger ID, e-mail address, residential address or business address (optional inputs), mobile phone number, profile picture (optional input), method of payment, registration data, language setting, profile of FIJOTAXI Passenger App (business or private customer), type of Journey (booking, try-out ride), version of the FIJOTAXI Passenger App, login information, your GPS location data at the time of the booking and at the time of the end of the Journey or, as it may be, the pickup and destination locations, device ID (device identifier), GAID (Google Advertising Identifier), IP address and usage data (usage frequency, information relating to the downloading of the FIJOTAXI Passenger App, status of the registration or of Journeys), language, time zone and city.

If you do not wish to receive the foregoing stated news & personalized offers, you can – just as easily as you consented – withdraw your consent by activating the corresponding toggle. Of course, you can also contact us by e-mail at fijotaxi@gmail.com or to the address stated in the introduction.

Please note that the withdrawal and ensuing changes are valid only for the future and will be effective or, as it may be, implemented by no later than 48 hours from withdrawal. This is for reasons of a technical nature, which do not permit faster implementation.

3.6.2 Direct Advertising for Existing Customers

If, in connect with the performance of our procurement services, we have received your e-mail address or mobile phone number and you have completed at least one Journey which we procured, we will use these exclusively for our own direct advertising of our own products and services via electronic post (e-mail, SMS and MMS), unless you have rejected such direct advertising. To this purpose, on the basis of our legitimate interest pursuant to Art. 6 (1) f) GDPR, we process the following data: e-mail address and mobile phone number. Our legitimate interest lies in intensifying customer relationships by proposing appropriate and interesting product information. The objection to direct advertising is possible at any time with effect for the future by clicking on the corresponding link in a relevant e-mail (e.g. to unsubscribe to a newsletter) or by contact via SMS. The direct advertisement sent by us is not personalized. Please take into account that the objection and the modifications required thereby are valid only for the future and will be effective or, as it may be, implemented by no later than 48 hours from withdrawal. This is for reasons of a technical nature, which do not permit faster implementation.

3.6.3 MailChimp

For sending news and offer e-mails, we make use of the service provider “MailChimp“, which is operated by Rocket Science Group, LLC, 675 Ponce De Leon Ave NE #5000, Atlanta, GA 30308, USA.

We have concluded with MailChimp a data processing agreement which ensures that MailChimp exclusively processes your Personal Data pursuant to our instructions and in accordance with current data protection law. By a licensing under the EU-US Privacy Shield, MailChimp guarantees that the Processing of Personal Data is subject to an adequate protection level vis-a-vis the processing of data in the USA, in that the requirements of European data protection law are adhered to. The legal basis for the transmission of data and its Processing by MailChimp is Art. 6 (1) f) GDPR in connection with Art. 28 GDPR. Our legitimate interest in the engaging of MailChimp lies in the professional and reasonable organization of automated processes in an economically sensible way which makes it possible to provide you a positive user experience.

3.6.4 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. In this context, the so called advertising identifier (IDFA or GAID) from the customer's end user device (e.g. smartphone) is sent automatically or manually, using a service provider selected by FIJOTAXI, to Facebook via a certain interface. The advertising identifiers are individual, but not personalized and not permanent identification numbers for a certain end user device which are provided by iOS or, as it may be, Android. You can prevent the transmission of advertising identifiers if, in iOS under "Settings" – "Data Protection" – "Advertising", you select the option "no ad tracking" or, as it may be, for Android, under "Settings" – "Google" – "Advertising" select the option "deactivate personalized advertising." Further, you have the option to delete the advertising identifier at any time in the device settings (iOS: "Reset Ad-ID"; Android: "Reset Advertising-ID"). Then, a new identification number will be generated for your device which will not be aggregated with the previously obtained data for your device. After the transmission of the advertising identifiers, FIJOTAXI will prepare a list of customers who have performed certain actions using the FIJOTAXI Passenger App. In this context, certain pre-defined actions can be selected (e.g. installation of the FIJOTAXI Passenger App in the previous 30 days). Facebook compares the advertising identifier of the customer with the advertising identifier of individuals with a Facebook profile, defines certain groups (e.g. Group 1: Installation in the previous 30 days) and then shows appropriate ads to this group. Facebook can also use the data to select other Facebook users whose statistical behaviors are similar to those of our customers or app users (so called statistical twins, called Lookalike Audience by Facebook). In this way, our advertising can reach individuals who are not yet using our services but who, with a high likelihood, would be interested in doing so. Customers who are not, at the same time, Facebook users, cannot

however be compared by Facebook and they are not shown any advertisements. Furthermore, conditioned upon your consent, we can manually transmit your e-mail address in an encrypted form to Facebook (so called hash procedure). Facebook then compares whether the transmitted e-mail address corresponds with existing Facebook customers. If there is a correspondence, then these target groups will be shown targeted advertisements/campaigns by FIJOTAXI on Facebook or on partner websites of Facebook. In connection with Facebook Custom Audiences, we process the following data pursuant to Art. 6 (1) a) GDPR: web identifier (IDFA for Apple or GAID for Google) and the e-mail address.

If you no longer wish for your data to be processed in connection with Facebook Custom Audiences, you can – just as easily as when you gave consent – withdraw your consent in the “Data Protection Settings” of the FIJOTAXI Passenger App *(under the option “Profile”) by turning off the toggle relating to “Personalized Advertising”. Naturally, you can also send us an e-mail to fijotaxi@gmail.com or to the address stated in the introduction.

Please note that the withdrawal and the thereupon ensuing changes are valid for the future and will be effective or, as it may be, implemented by no later than 48 hours from the withdrawal. This is for reasons of a technical nature, which do not permit faster implementation.

3.7 Studies & Surveys

If you have consented in the course of the registration process or, later, in the profile of the FIJOTAXI Passenger App under “Data Protection”, to receive studies and surveys, and have activated the corresponding toggle, after a Journey or at some other time, we will contact you after a Journey or at some other time in the context of personalized (sent only to you and based on an analysis of the FIJOTAXI Passenger App usage frequency) studies and surveys sent by electronic post (e-mail, SMS, MMS) or otherwise electronically (in-app messages, push messages) and request your participation. In connection herewith, we process the following Personal Data pursuant to Art. 6 (1) a) GDPR:

First and last name, passenger ID, e-mail address, residential and/or business address (optional entry), mobile phone number, profile picture (optional input), payment method, registration date, language set, FIJOTAXI Passenger App profile (business or private customer), type of Journey (booking, try-out ride), FIJOTAXI Passenger App version, login details (user name), your GPS coordinates at the time of booking and at the end of the Journey, and usage data (usage frequency, information about the download of the FIJOTAXI Passenger App, status of

registration or Journey), date registered, date of the last login, push tokens, passenger status, redeemed voucher value sum, total number voucher redeemed, voucher value sum on record, total number of vouches active, total number favorite Drivers, number of tours with favorite Driver, work address on record (yes/no), home address on record (yes/no), gross merchandise value, total number of tours, number of cancelled Journeys, rate of Journey evaluations, evaluations, business credit card on record (yes/no), invoice address on record (yes/no), tip value preference.

If you do not wish to be contacted in this regard, you can – just as easily as you gave consent – declare your withdrawal by activating the foregoing toggle. Of course, you can also contact us by e-mail at fijotaxi@gmail.com or to the address stated in the introduction.

Please note that the revocation and ensuing changes are valid only for the future and will be effective or, as it may be, implemented by no later than 48 hours from the revocation. This is for reasons of a technical nature, which do not permit faster implementation.

3.8 Social Media Presences

3.8.1 Facebook

When entering our Facebook-page (via a link on our website, in our newsletter or directly) you reach the technical platform provided by Facebook Ireland Ltd., 4 Grand Canal Square Grand Canal Harbour, Dublin 2, Ireland (“Facebook”). We would like to inform you that you use the Facebook-page and its functions on your own responsibility. This especially applies for the use of the interactive functions (e.g. comments, sharing, rating). During your visit on our Facebook-page, FIJOTAXI basically processes personal data only if you interact with us via the page, e.g. when leaving a comment, press a like-button or sending us a message. The legal basis for this processing depends on the way you use the page. If you send us a contract-related request for example, the processing is based on Art. 6 (1) (b) GDPR. Moreover, according to Art. 6 (1) (a) GDPR your data can be processed with your consent when you like or comment one our posts or provide content on our page yourself. You can withdraw your consent any time with future effect by deleting the comment or your regarding content. The revocation does not affect the legitimate consent-based processing that was performed until the revocation. Additionally, we analyze the visits and interactions on our page. For this Facebook creates usage profiles and provides solely anonymous data in form of page-insights (“page-insights”). Page-insights are summarized data that allows us to get an overview on how users interact with our facebook-page. For further information please visit: <https://www.facebook.com/help/pages/insights>. Please mind that your personal data is not only

processed by FIJOTAXI , but also by Facebook while using and interacting with our Facebook-page. FIJOTAXI and Facebook are jointly responsible for the processing of insight-data. The respective responsibilities für FIJOTAXI and Facebook regarding the processing of insight-data are available in the page insights addendum: https://www.facebook.com/legal/terms/page_controller_addendum. How Facebook uses insight-data for its own purposes, to what extent insight data can be matched with certain users, for how long this data is stored and if data resulting from your visit on a Facebook-page is handed over to third parties is solely the responsibility of Facebook. Regarding the data processing via our Facebook-page, you can not only assert your rights under the GDPR (for further information see section 5 "Your Rights" of this document) towards FIJOTAXI , but also towards Facebook. Further details can be found in Facebook's data policy under: <https://www.facebook.com/about/privacy>. Additional to the before-mentioned processing activities, Facebook also processes your data for analysis and advertising purposes, respectively to display personalized advertisements. According to our knowledge, Facebook makes use of cookies, pixels and other techniques which process your usage behaviour (even across different devices. This enables Facebook to display target-oriented advertisements on its own platforms and third-party websites, as well. The data collected about you in this context are transmitted to the United States of America and other non-EU countries. Which exact information Facebook receives and how it is used, is generally described in Facebook's privacy policy. There you will also find ways to contact Facebook directly and information on settings for advertisements. The privacy policy is available under <https://www.facebook.com/about/privacy>. The complete privacy policy can be found here: https://www.facebook.com/full_data_use_policy Furthermore, Facebook offers its users the possibility to object to certain processing activities. More information on this and opt-out-possibilities can be found here: <https://www.facebook.com/settings?tab=ads>.

3.8.2 Links to social networks Instagram, Twitter, LinkedIn, Xing, Youtube

On our website and in our newsletters we link our accounts on other social media platforms Instagram (Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA; "Instagram"), LinkedIn (LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland "LinkedIn"); Twitter (Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland "Twitter"), Youtube (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Youtube") and Xing (XING SE, Dammtorstraße 30, 20354 Hamburg "Xing") via the icon of the respective social network. When you click the links or visit our pages on the platform directly, you are on the website of the respective social media platform. The general terms and conditions and privacy policies of the respective social media network provider. We would like to inform you that we do not receive any information about the content and extent of the data processing performed by the social media network. Information on how the respective social media platform handles your data can be found in the following privacy policies:

- for Instagram under <http://instagram.com/about/legal/privacy/>
- for LinkedIn under <https://www.linkedin.com/legal/privacy-policy>
- for Xing under <https://privacy.xing.com/en> und <https://privacy.xing.com/en/privacy-policy>
- for Twitter under: <https://twitter.com/en/privacy> and <https://help.twitter.com/en/rules-and-policies/twitter-cookies>
- for Youtube: <https://policies.google.com/privacy?hl=en&gl=de>

We process personal data on our social media pages as far as the user interacts with us directly, by commenting or liking our posts or sending messages. Legal basis for this kind of processing is the user's consent according to Art. 6 (1) (a) GDPR or in case of contract-related requests Art. 6 (1) (b) GDPR. As the case may be, we share content on our social media page, if this is a function of the social media platform and communicate with you via this platform. Art. 6 (1) (1.) (f) GDPR builds the legal basis for this. The processing is performed due to a legitimate interest in public relations and communications.

4. Data Exchange within the FIJOTAXI Group

For internal administration and standardization purposes, we may transfer personal data of drivers or passengers within the FIJOTAXI Group. The legal basis for this is our legitimate interest in effective company management, Art. 6 (1) f) GDPR, see also Recital 48 to the GDPR.

5. Processor and Processing in Countries Outside of the European Economic Area

In part, we engage for external service providers to process your data (e.g. troubleshooting, creation of mailings). To this end it is 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 and engaged them in writing. They are bound by our instructions and we have obtained information about their technical and organizational 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 foreign EEA countries. We have concluded a data processing agreement with

our external service providers in accordance with Art. 28 (3) GDPR, inasmuch as this is required for the contractual purpose. The transfer to service providers outside of the European Economic Area takes place correspondingly on the basis of decisions by the EU Commission pursuant to Art. 45 GDPR (e.g. Privacy Shield) or on the basis of standard EU contractual clauses.

In the event of the United Kingdom's unregulated withdrawal from the European Union ("hard brexit"), through which the UK would at least temporarily become a third country in terms of data protection, we have concluded standard contractual clauses (SCCs) with our UK location to ensure the consistent legality of data transfers.

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 do not sell any Personal Data to third parties.

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

6. Your Rights

If Personal Data belonging to you is processed, you are an affected party in the sense of GDPR and you have the following rights vis-à-vis FIJOTAXI :

You can, at any time, free of cost, obtain information regarding the extent, the origin and the recipient of retained data as well as the purpose of the retention (Art. 15 GDPR). You can, at any time, ask for incorrect data to be corrected (Art. 16 GDPR). Additionally, you have the possibility of receiving Personal Data related to you in a structured, common and machine-readable format (Art. 20 GDPR).

You can object to the usage of your Personal Data for the future (Art. 21 GDPR). You can also ask for a partial or complete deletion (Art. 17 GDPR), limitation of processing or a block (Art. 18 GDPR) of your Personal Data. We will examine this claim and, if there is no other statutory basis for the continued processing, we will comply. We will inform you regarding the result.

Irrespective of any other administrative or judicial legal remedy, you have the right to file a complaint regarding the processing of your Personal Data by us with a data protection oversight authority.

All informational requests, queries, revocations of consent, objections or other issues regarding data protection can also be sent by e-mail to fijotaxi@gmail.com or to the address stated in the introduction.

7. Data Security

We have taken appropriate technical and organizational 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 end user device (e.g. smartphone) to us is always encrypted. FIJOTAXI is PCI DSS (Payment Card Industry Data Security Standard) certified.

8. Storage Period

The data provided by you to us is only stored for as long as is required to perform the respective purpose for which you have transmitted your data, or inasmuch as it is required for conformity with statutory or official requirements. Personal Data is anonymized by us, in principle, after three years, unless we have a legitimate interest in a longer storage period (e.g. bookkeeping requirements).

9. Updates and Changes

We retain the right to modify this privacy policy in the future. In case we change the privacy policy, we will inform you regarding such changes in a timely manner and will offer you the opportunity to consent or reject.

