

Introduction

When you use Carfie, you trust us with your information. We are committed to keeping that trust. That starts with helping you understand our privacy practices.

This policy describes the information we collect, how it is used and shared, and your choices regarding this information. We recommend that you read this along with our Privacy Overview, which highlights key points about our privacy practices (including what information we collect, when we collect it, and how we use it).

Created: September 25, 2019

Effective Date: October 25, 2019

Data Collections And Uses

Scope

SUMMARY

This policy applies to users of Carfie Inc. services anywhere in the United States, including users of Carfie apps, websites, features or other services.

This policy describes how Carfie collects and uses personal data to provide our services. This policy applies to all users of our apps, websites, features or other services anywhere in the United States.

This policy specifically applies to:

- Riders: users who request or receive transportation
- Drivers: users who provide transportation individually

This policy also applies to those who provide information to Carfie in connection with an application to use our services, or whose information Carfie receives in connection with its services. All those subject to this policy are referred to as “users” for purposes of this policy.

The practices described in this policy are subject to applicable laws in the places in which we operate. This means that we only engage in the practices described in this policy particular in the United States as permitted under the laws of the United States. Please contact us if you have questions on our practices in your State.

Data Controller

SUMMARY

Carfie Inc. provides services to users throughout the United States. If you use our services in the United States, Carfie is the data controller for your information.

Carfie Inc.
14681 Midway Road,
Addison Tx
75001 Suite 200.

Questions, comments and complaints about Carfie’s data practices can be submitted to Carfie’s data protection office through [here](#).

We process personal information inside the United States.

The Information We Collect

SUMMARY

Carfie Inc. collects:

- Information that you provide to Carfie , such as when you create your Carfie account.
- Information created when you use our services, such as location, usage and device information.
- Information from other sources, such as Carfie partners and third parties.

The following information is collected by or on behalf of Carfie Inc.:

1 Information you provide

This may include:

- **User profile:** We collect information when you create or update your Carfie account. This may include your name, email, phone number, login name and password, address, payment or banking information (including related payment verification information), government identification numbers such as Social Security number, driver's license or passport if required by law, birth date, photo and signature. This also includes vehicle or insurance information of drivers. This also includes the preferences and settings that you enable for your Carfie account.
- **Background check information:** We may collect background check information if you sign up to use Carfie services. This may include information such as your driver history or criminal record (where permitted by law). This information may be collected by a vendor on Carfie's behalf.
- **Demographic data:** We may collect demographic information about you, including through user surveys.
- **User content:** We may collect information that you submit when you contact Carfie's customer support, provide ratings or compliments for other users, or otherwise.

2 Information created when you use our services

This may include:

▪ Location Information

Depending on the Carfie services that you use, and your app settings or device permissions, we may collect your precise or approximate location information as determined through data such as GPS, IP address and WiFi.

- If you are a driver, Carfie collects location information when the Carfie app is running in the foreground (app open and on-screen) or background (app open but not on screen) of your device.
- If you are a rider and have provided permission for the processing of location data, Carfie collects location information when the Carfie app is running in the foreground. In certain areas, Carfie also collects this information when the Carfie app is running in the background of your device if this collection is enabled through your app settings or device permissions.
- Riders and recipients may use the Carfie app without enabling Carfie to collect their location information. However, this may affect the functionality available on your Carfie app. For example, if you do not enable Carfie to collect your location information, you

will have to manually enter your pickup address. In addition, location information will be collected from the driver during your trip and linked to your account, even if you have not enabled Carfie to collect your location information.

- Transaction Information

We collect transaction details related to your use of our services, including the type of services you requested or provided, your order details, delivery information, date and time the service was provided, amount charged, distance traveled, and payment method. Additionally, if someone uses your promotion code, we may associate your name with that person.

- Usage information

We collect information about how you interact with our services. This includes information such as access dates and times, app features or pages viewed, app crashes and other system activity, type of browser, and third-party sites or service you were using before interacting with our services. In some cases, we collect this information through cookies, pixel tags, and similar technologies that create and maintain unique identifiers. To learn more about these technologies, please see our Cookie Statement.

- Device Information

We may collect information about the devices you use to access our services, including the hardware models, device IP address, operating systems and versions, software, file names and versions, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion information, and mobile network information.

- Communications data

We enable users to communicate with each other and Carfie through the Carfie apps, websites, and other services. For example, we enable drivers and riders, to call or text each other. To provide this service, Carfie receives some information regarding the calls or texts, including the date and time of the call/text, and the content of the communications. Carfie may also use this information for customer support services (including to resolve disputes between users), for safety and security purposes, to improve our products and services and for analytics.

3 Information from other sources

These may include:

- User feedback, such as as ratings or compliments.
- Users providing your information in connection with referral programs.
- Users requesting services for or on your behalf.
- Users or others providing information in connection with claims or disputes.
- Carfie partners through which you create or access your Carfie account, such as payment providers, social media services, on-demand music services, or apps or websites.
- Insurance providers (if you are a driver).
- Financial services providers (if you are a driver).

How We Use Your Information

SUMMARY

Carfie collects and uses information to enable reliable and convenient transportation, delivery and other products and services. We also use the information we collect:

- To enhance the safety and security of our users and services
- For customer support
- For research and development
- To enable communications to or between users
- To provide promotions or contests
- In connection with legal proceedings

Carfie does not sell or share your personal information to third parties for third party direct marketing purposes.

Carfie uses the information it collects for purposes including:

1 Providing services and features

Carfie uses the information we collect to provide, personalize, maintain and improve our products and services. This includes using the information to:

- Create and update your account.
- Verify your identity.
- Enable transportation, deliveries, and other services. This includes automated processing of your information to enable Dynamic Pricing, in which the price of a ride is determined based on constantly varying factors such as the estimated time and distance of the predicted route, estimated traffic, and the number of riders and drivers using Carfie at a given moment.
- Process or facilitate payments for those services.
- Offer, obtain, provide or facilitate insurance or financing solutions in connection with our services.
- To track the progress of your ride.
- Enable features that allow you to share information with other people, such as when you submit a compliment about a driver, refer a friend to Carfie, fares, or share your ETA.
- Enable features to personalize your Carfie account, such as creating bookmarks for your favorite places, and to enable quick access to previous destinations.
- Enable Accessibility features that make it easier for users with disabilities to use our services, such as those which enable deaf or hard-of-hearing drivers to alert their riders of their disabilities, allow only text messages from riders, and to receive flashing trip request notifications instead of sound notifications.
- Perform internal operations necessary to provide our services, including to troubleshoot software bugs and operational problems, to conduct data analysis, testing, and research, and to monitor and analyze usage and activity trends.

2 Safety and security

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

- Screening drivers and delivery partners prior to enabling their use of our services and at subsequent intervals, including through reviews of background checks where permitted by law, to prevent use of our services by unsafe drivers.

- Using information from drivers' devices to identify unsafe driving behavior such as speeding or harsh braking and acceleration, and to raise awareness among drivers regarding such behaviors.
- Using device, location, profile, usage and other information to prevent, detect, and combat fraud or unsafe activities. This includes processing of such information, in certain countries, to identify practices or patterns that indicate fraud or risk of safety incidents. This may also include information from third parties. In certain cases such incidents may lead to deactivation by means of an automated decision making process.
- Using user ratings to encourage improvement by affected users, and as grounds for deactivating users with ratings below a certain minimum as may be required in their area.

3 Customer support

Carfie uses the information we collect (including recordings of customer support calls after notice to you and with your consent) to assist you when you contact our customer support services, including to:

- Direct your questions to the appropriate customer support person
- Investigate and address your concerns
- Monitor and improve our customer support responses

4 Research and development

We may use the information we collect for testing, research, analysis and product development. This allows us to improve and enhance the safety and security of our services, develop new features and products, and facilitate insurance and finance solutions in connection with our services.

5 Communications among users Carfie uses the information we collect to enable communications between our users. For example, a driver may text or call a rider to confirm a pickup location.

6 Communications from Carfie

Carfie may use the information we collect to communicate with you about products, services, promotions, studies, surveys, news, updates and events.

Carfie may also use the information to promote and process contests and sweepstakes, fulfill any related awards, and serve you relevant ads and content about our services and those of our business partners. You may receive some of these communications based on your profile as a Carfie user.

7 Legal proceedings and requirements

We may use the information we collect to investigate or address claims or disputes relating to your use of Carfie services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.

Cookies And Third Party Technologies SUMMARY

Carfie and its partners use cookies and other identification technologies on our apps, websites, emails, and online ads for purposes described in this policy.

Cookies are small text files that are stored on your browser or device by websites, apps, online media, and advertisements. Carfie 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 your device when you visit our site and use our services, as well as when you visit other online sites and services. Please see our Cookie Statement for more information regarding the use of cookies and other technologies described in this section, including regarding your choices relating to such technologies.

Information Sharing And Disclosure

SUMMARY

Carfie services and features require that we share information with other users or at your request. We may also share your information with our affiliates, subsidiaries and business partners, for legal reasons or in connection with claims or disputes.

Carfie may share the information we collect:

1 With other users

- For example, if you are a rider, we may share your first name, average rider rating given by drivers, and pickup and/or dropoff locations with drivers.
- If you are a driver or delivery partner, we may share information with your rider(s) including name and photo; vehicle make, model, color, license plate, and vehicle photo; location; average rating provided by riders; total number of trips; for how long you have been using the Carfie app; and contact information (depending upon applicable laws). If you choose to complete a driver profile, we may also share any information associated with that profile, including information that you submit and compliments that past riders have submitted about you. The rider/recipient will also receive a receipt containing information such as a breakdown of amounts charged, your first name, photo, and a map of the route you took.

2 At your request

This includes sharing your information with:

- Other people at your request. For example, we may share your ETA and location with a friend at your request, or your trip information when you split a fare with a friend.

3 With the owner of Carfie accounts that you may use

If you use a profile associated with another party we may share your trip information with the owner of that profile.

4 With Carfie affiliates

We share information with our subsidiaries and affiliates to help us provide our services or conduct data processing on our behalf.

5 With Carfie service providers and business partners

Carfie may provide information to its vendors, consultants, marketing partners, research firms, and other service providers or business partners. This may include, for example:

- Payment processors and facilitators.
- Background check providers (drivers only).
- Cloud storage providers.
- Marketing partners and marketing platform providers.
- Data analytics providers.
- Research partners, including those performing surveys or research projects in partnership with Carfie or on Carfie's behalf.
- Vendors that assist Carfie to enhance the safety and security of its apps.
- Consultants, lawyers, accountants and other professional service providers.
- Fleet partners.
- Insurance and financing partners.
- Airports.
- Vehicle solution vendors or third party vehicle suppliers.

6 For legal reasons or in the event of a dispute we may share your information if we believe it is required by applicable law, regulation, operating agreement, legal process or governmental request, or where the disclosure is otherwise appropriate due to safety or similar concerns.

This includes sharing your information with law enforcement officials, 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 Carfie's rights or property or the rights, safety or property of others, or in the event of a claim or dispute relating to your use of our services. If you use another person's credit card, we may be required by law to share information with that credit card holder, including trip information.

This also includes sharing your information 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. Please see Carfie Guidelines for Law Enforcement Authorities for more information.

8 With your consent

Carfie may share your information other than as described in this policy if we notify you and you consent to the sharing.

Information Retention And Deletion

SUMMARY

Carfie retains user profile and other information for as long as you maintain your Carfie account.

Carfie retains transaction, location, usage and other information for 7 years in connection with regulatory, tax, insurance or other requirements in the places in which

it operates. Carfie thereafter deletes or anonymizes such information in accordance with applicable laws.

Users may request deletion of their accounts at any time. Following such request, Carfie deletes the information that it is not required to retain, and restricts access to or use of any information it is required to retain.

Carfie requires user profile information in order to provide its services, and retains such information for as long you maintain your Carfie account.

Carfie retains certain information, including transaction, location, device and usage information, for a minimum of 7 years in connection with regulatory, tax, insurance and other requirements in the places in which it operates. Once such information is no longer necessary to provide Carfie services, enable customer support, enhance the user experience or other operational purposes, Carfie takes steps to prevent access to or use of such information for any purpose other than compliance with these requirements or for purposes of safety, security and fraud prevention and detection.

You may request deletion of your account at any time through the Privacy Settings in the Carfie app, or via Carfie website (riders and drivers).

Following such request, Carfie deletes the information that it is not required to retain.

In certain circumstances, Carfie may be unable to delete your account, such as if there is an outstanding credit on your account or an unresolved claim or dispute. Upon resolution of the issue preventing deletion, Carfie will delete your account as described above.

Carfie may also retain certain information if necessary for its legitimate business interests, such as fraud prevention and enhancing users' safety and security. For example, if Carfie shuts down a user's account because of unsafe behavior or security incidents, Carfie may retain certain information about that account to prevent that user from opening a new Carfie account in the future.

SUMMARY

We may occasionally update this policy.

We may occasionally update this policy. If we make significant changes, we will notify you of the changes through the Carfie apps or through other means, such as email. To the extent permitted under applicable law, by using our services after such notice, you consent to our updates to this policy.

We encourage you to periodically review this policy for the latest information on our privacy practices. We will also make prior versions of our privacy policies available for review.