

# PRIVACY POLICY AMBER



P33 Development B.V. and all its affiliated companies (“**Amber**”, “**we**”, “**us**” of “**our**”) take the privacy of your (“**User**” or “**you**”) personal data very seriously. Therefore, your personal data is handled and protected with the utmost care. Hereby, Amber adheres at all times to the applicable laws and regulations

Please read this privacy policy (“**Privacy Policy**”) before you use the mobility services of Amber (“**Services**”) of which are part: the website [www.ambermobility.com](http://www.ambermobility.com) (“**Website**”) and the app of Amber (“**App**”) (Website and App together “**Platform**”) and the (electrically) powered vehicles (de “**Vehicles**”). Your employer or other legal entity (“**Contractor**”) enables you to make use of the Services. By using the Services (which includes the download and installation of the App) you agree to this Privacy Policy.

In this Privacy Policy, you are given an insight into the data we collect, why we collect it and what we do with such data.

## 1. Data that Amber collects and for which purpose

In relation to the agreement between Contractor and Amber for the execution of the Services, Amber processes the personal data for the purposes as listed below. Your personal data is required and you give permission to use the following personal data:

Creating a user account: to create a user account, you must provide your contact details (first name, last name, phone number, e-mail address, gender, date of birth and address) (“**Contact Information**”) as well as other information (employer name and password (hashed)) (“**Other Data**”).

Creating a reservation: in order to make a reservation via the Platform, the following information is required: (i) your Contact Information; (ii) your Other Data; (iii) a copy of your driving license (excluding visible photo and citizen identification number (BSN-number)); (iv) choice of a payment method; and (v) choice of a hub where the reservation starts. This information is required to check whether you meet the requirements set by Amber and Contractor for a user of the Service and for the processing of payments (hereafter “**Reservation data**”).

Information messages: Amber may use your Contact Information to send information messages (not marketing communications) necessary to provide the Services.

Testing and analysis: we use personal data to analyze how registered Users use the Platform. This also includes the use of the data to detect and correct errors and malfunctions in the rental process.

Data aggregation: to minimize the processing of your personal data, Amber can merge or encrypt your personal data to create anonymous data that cannot be traced back to a natural person.

Use and status of the Vehicle: to the extent necessary for the performance of the contract between Contractor and Amber for the execution of the Services, we collect data about the use of the Vehicle (such as: the time of the start and end of the reservation, start- and final location of the trips during a reservation, locking operations of the Vehicle via the Platform, status of the Vehicle (such as GPS location, battery percentage, status of the ignition switch and whether or not the battery is charging).



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Compliance with (local) legislation: Amber may be required to comply with the applicable local legislation to process your personal data for purposes other than those set out in this Privacy Policy, for example for law enforcement and in case of a court order.

Fraud detection: Amber processes personal data for fraud detection and to prevent fraud and abuse. If we have a reasonable suspicion of any fraud, fraud or criminal activity imputable to you, or we can determine this, your personal data will be processed to prevent you from being able to use our Services in the future.

Customer service: Amber may collect and share your personal information to provide (international) customer service. For example, Amber may collect requests received by customer service and the replies in relation thereto, along with other Contact Information and Other Data of Users. In this way Amber can respond better to questions.

Marketing: Insofar as permitted under applicable law, Amber may use your Contact Information for marketing communications, such as newsletters. You can unsubscribe at any time. The newsletter may also contain information and offers from third parties. Each newsletter contains a link that allows you to unsubscribe from our newsletter. The subscriber file of the newsletter will not be provided to third parties, unless you have given explicit permission to do so.

### 2. Overview of the retention period of personal data

The table below shows which data is stored for which period and when this data is deleted.

Category of data	Retention period	Deleted after termination of the Services/ deregistration of user account
Contact Information	2 years after termination of the Services/ deregistration of user account	Yes
Copy of driving license	2 months after termination of the Services/ deregistration of user account	Yes
Data regarding the use of the Vehicle	2 years after termination of the Services/ deregistration of user account	Yes
Marketing data	2 years after termination of the Services/ deregistration of user account	Yes
User profile data	2 years after termination of the Services/ deregistration of user account	Yes
Data regarding compliance with local legislation	As required by applicable legislation	Insofar permitted by applicable legislation
Reservation data	2 years after termination of the Services/ deregistration of user account	Yes
Fraud detection data	Reasonable term (in any case 5 years)	Yes

Please note: you should keep in mind that Amber can keep collected data at any time in an aggregated and anonymous form for (market) research, analysis and / or fraud protection.





### **3. Providing personal data to Contractor or third-parties**

In the situations listed below, Amber is allowed to share your personal information with third parties. Amber will only share your personal data if there is a 'need-to-know'.

Contractor: in the context of the performance of the contract with the Contractor, Amber will provide certain relevant information to the Contractor with regard to your use of the Service (for example use of the Vehicle and information for necessary for the billing of the reservations).

Competent authorities: Amber discloses personal data to authorities in charge of law enforcement and other government agencies, to the extent required by law or strictly necessary for the prevention, detection or prosecution of criminal offenses and fraud.

Assignment: Amber may transfer your personal data to third parties in the event of a merger, acquisition, reorganization, sale of business units or bankruptcy of Amber. Amber will request your permission in advance if this is required under applicable law.

### **4. Use of cookies**

Amber uses cookies on the Website. By clicking "Ok" on the cookie notification of our Website or continuing to use the Website, you consent to the placing of cookies. A cookie is a simple small file that a website stores on your hard disk via the browser. Information is stored in a cookie. Different types of cookies can be used per visit. Below you find more information about the cookies used by and via the Website and for what purposes.

### **5. What type of cookies are used on the Website and for what purpose**

The Website makes use of the different types of cookies listed below and for the purposes listed below:

Analytical cookies: these cookies are anonymous and allow Amber to improve the Website. These cookies collect information about the way visitors use the Website, such as information about the most frequently visited pages or the number of displayed error messages. The information collected by these cookies may not be used for marketing purposes and will not be passed on to third parties.

Session cookies: session cookies are used during your visit and are automatically deleted when you close the browser. Through these cookies we can remember which parts of our Website you viewed during a visit and we coordinate our services accordingly.

Social media cookies: these are cookies to share the content of our Website via social media. For the functioning of these buttons social media cookies are used from the social media parties, so that they recognize you when you want to share a page of the Website. For the cookies that the social media parties place and the possible data they collect, we refer you to the statements that these parties provide on their own websites.

Other / unforeseen cookies: due to the way internet and websites work, Amber may not always have insight into the cookies that third parties place via our Website. This is especially the case when our web pages contain so-called 'embedded elements' (these are texts, documents, images or films that are stored with another party, but which are displayed on, in or via our Website).





## 6. Specific overview of the cookies used

Below you will find an overview of the cookies used on the Website. We have indicated by whom the cookies are placed, for what purpose and for how long they are used. We would like to point out that in spite of our efforts, it is possible that the overview below is not entirely complete.

### Analytical Cookies:

Cookie name	Placed by	Purpose	Duration
_ga	Google Analytics	This cookie enables us to gather and collection information about the users of our Website so that we gain insight into the parts of our Website that are most frequently visited	2 years
_gat	Google Analytics	This cookie is used to throttle the request rate	1 minute
_gid	Google Analytics	This cookie is used to distinguish the number of unique users of our Website	24 hours

### Session cookies:

Cookie name	Placed by	Purpose	Duration
PHPSESSID	Amber	This cookie is used to remember the data of the entry fields during login and making of a reservation	For the duration of the session

### Social media cookies:

Cookie name	Placed by	Purpose	Duration
_twitter_sess	Twitter	Distinguish user sessions	For the duration of the session
lang	Twitter	Remember language preference	For the duration of the session





eu_cn	Twitter	Remember the cookie consent preference	1 year
guest_id	Twitter	Distinguish individual users	2 years
external_referer	Twitter	Other cookies used by the Twitter plugin. For more information, go to <a href="https://twitter.com/privacy">https://twitter.com/privacy</a>	7 days
personalization_id	Twitter		2 years
tfw_exp	Twitter		14 days
ct0	Twitter		6 hours

### 7. Customize cookie settings or delete cookies

If you do not want Amber to place cookies on your (mobile) device, you can refuse the use of cookies through the settings or options of your browser. For each browser and each (mobile) device, you have to adjust your settings separately. Note: it is possible that after modification of the cookie settings, some parts of the Website can no longer be (correctly) used. When Amber has placed cookies, you can also delete them. How to do this, differs per browser. If necessary, consult the help function of your browser. More information about cookies can be found on the websites of [Cookierecht](#) and the [Consumentenbond](#).

We ask you kindly to notify us in case you find a cookie used on the Website that is not mentioned above.

### 8. Security

We try to do everything we can to protect your personal data. Amber uses technical and organizational security measures to protect the personal data managed by Amber against manipulation, loss, destruction and unauthorized access. These safety measures are constantly being improved in line with technological developments. For example, all entry fields on the Platform are TLS protected. Furthermore, the Platform is continuously updated with the latest security updates. The Platform may contain links to external websites that are managed by other companies. It is possible that they collect personal information from people who visit their website. Amber cannot offer any guarantees regarding the privacy policy of external websites and is not responsible for those websites.

### 9. Right to inspection, correction or deletion of personal data

You have the right to inspection, correction or deletion of your personal data at any time. For any of these actions please contact us via e-mail: [support@amber.team](mailto:support@amber.team). In addition thereto, with regard to certain personal data, Users can itself view, delete or correct personal data via the Platform. However, in the event that, despite our efforts to ensure correctness of personal data, incorrect information is stored, we will correct such data on your request.

### 10. Revision Clause

Amber reserves the right to change this Privacy Policy. However, we do not limit your rights under this Privacy Policy without your express consent. You can find the most up-to-date version of this Privacy Policy at any time on the Platform. We recommend that you check whether an updated version is available before making a reservation.





**11. Translation**

This Privacy Policy is drawn up in Dutch and English. In case of contradictions between these versions, the Dutch version prevails.

**12. Contact details**

In case of any questions about this Privacy Policy, you can contact us by regular mail via: P33 Development B.V., High Tech Campus 1, AE Eindhoven, the Netherlands or by e-mail [support@amber.team](mailto:support@amber.team). You can also use this contact data if you have questions about your personal data.

**13. Date**

This Privacy Policy was last amended on November 20 2017.

