

# PRIVACY NOTICE

## 1 GENERAL

- 1.1 Electric Beast Global OÜ (“**we**” or “**us**”) provides vehicle rental services to the drivers and vehicle listing and operating services to the partners via website or app (“**Services**”). Your privacy is important to us and therefore, it is our policy to respect your privacy and protect your personal data.
- 1.2 This privacy notice (“**Notice**”) explains the principles on how we collect, use, store and disclose personal data when you: (i) visit or otherwise interact with our website <https://beast.rent> (“**Website**”) and/or our mobile application Beast (available on iOS and Android) (“**App**”); (ii) you or the legal entity you represent wishes to conclude or has concluded an agreement with us, including rent a vehicle (according to the Vehicle Rental and Service Provision Terms and Conditions (“**Driver Terms**”)) or list and operate a vehicle (according to the Partner’s Vehicle Listing and Operation Terms and Conditions (“**Partner Terms**”)) (hereinafter together “**Terms**”); (iii) subscribe to our newsletter and/or participate in marketing competitions; (iv) communicate with us by phone, e-mail, social networks and/or in other ways; or (v) take any other actions on our Website, App or other sites we own and operate.
- 1.3 We process your personal data as described in this Notice and in accordance with applicable legislation, including the European Union’s General Data Protection Regulation (2016/679) (“**GDPR**”) and other data protection legislation, as applicable towards the controller stated in Section 2 of this Notice.
- 1.4 In case you disclose any personal data regarding any third person(s) (e.g., your employee, management board member, co-worker, etc.) to us, you are obligated to refer them to this Notice.

## 2 CONTROLLER

- 2.1 For the personal data processing purposes brought out in Section 4 of this Notice, the controller of your personal data is: **Electric Beast Global OÜ**, a company incorporated under the laws of Estonia, with registry code 16266059. In case of personal data protection related inquiries please contact us by writing to [legal@electricbeast.co](mailto:legal@electricbeast.co).

## 3 CATEGORIES AND SOURCES OF PERSONAL DATA

- 3.1 Personal data is any information that can be used to directly or indirectly uniquely identify you as a private individual (“**Personal Data**”). We may obtain and process the following categories of Personal Data:
  - 3.1.1 For concluding and managing contractual relationship with you or the legal entity your work for or represent, we may process the following Personal Data: name, date of birth, e-mail address, phone number, address, the legal entity’s information you represent (e.g., legal entity’s name, address, registry code) (if applicable), data regarding of the usage of the Services (e.g., rides history, accidents data, debt data, damage caused to us and third parties, fines, including parking fines, violations to the Terms), your promo code, your geographical location (“**Main Data**”);

- 3.1.2 For managing the contractual relationship and processing payments, we may process the following Personal Data: Main Data, payment information (e.g., bank account number, payment card details, date/time/amount of transaction, amount of Beast Bucks), the results of the payment verification process (“**Payment Data**”);
  - 3.1.3 For us to be able to verify the validity of your driving license, we may process the following Personal Data: Main Data, details of identification documents (e.g., issuing country, document type, number, date of issue and date of expiry), facial recognition data (photographs, videos and audio recordings, biometric data), the results of the identity verification process, duration of the use of the verification system, and information about installed packages on your device (“**Verification Data**”).
  - 3.1.4 We record data about the vehicle through an electronic system installed in the vehicle (including Sentry Mode), which may include the following Personal Data: location of the vehicle and its surroundings, the distance covered by the vehicle, the time of use of the vehicle, other data related to the vehicle and use thereof (“**Vehicle System Data**”);
  - 3.1.5 If you interact with us via the Website, App, social media platforms or e-mail, we may process the following Personal Data: Main Data, your username on the platform through you interact with us, date, time and contents of your message (“**Communication Data**”)
  - 3.1.6 Marketing data: Main Data, position. Additionally, we may supplement the Personal Data that you have provided to us directly with information that has been obtained from publicly available resources (i.e. LinkedIn, e-mail search, country specific commercial registrars) (“**Marketing Data**”).
  - 3.1.7 When you visit our Website or App, our servers may automatically log the following standard data provided by your web browser or device, which may include your Personal Data: your device’s Internet Protocol (IP) address, your browser type and version, the webpages you visit on our Website and the time spent on each page, the time and date of your visit (“**Log Data**”);
  - 3.1.8 We may also collect the following data, which may include your Personal Data, about the device you’re using to access our Website or App: device type, operating system, unique device identifiers, device settings, and geo-location data. What we collect can depend on the individual settings of your device and software. We recommend checking the policies of your device manufacturer or software provider to learn what information they make available to us (“**Device Data**”);
  - 3.1.9 When you use the Services, we may process the following data, which may include your Personal Data: user ID, user role, action made in product, attributes to that action, error logs (“**Usage Data**”).
  - 3.1.10 We use cookies to collect information about you and your activity across our site. A cookie is a small piece of data that our website stores on your computer or mobile device, and accesses each time you visit, so we can understand how you use our site. This helps us serve you content based on preferences you have specified. Please refer to our Cookie Notice for more information.
- 3.2 We may obtain your personal data directly from you, including when you agree to the Terms, use the Website, App or Service, the legal entity you represent, service providers (e.g., from

payment or verification service providers), third parties according to your instruction and choices, other resources (e.g., from official institutions regarding data on the validity of the driver's licence, from police or insurance regarding violations and traffic incidents, public registers).

**3.3** If you do not provide the required information, we may not be able to provide our Services, contact you or fill any other purposes provided in Section 4 of this Notice.

**4 LEGAL BASES AND PURPOSES OF PROCESSING PERSONAL DATA**

**4.1** We process your Personal Data lawfully, fairly and in a transparent manner, including only where we have legal bases for doing so. The legal basis to process your Personal Data depends on the objective and context in which we collect the Personal Data. The following depicts a descriptive list of processing purposes that are linked to the specific data categories and legal basis for processing:

<b>Processing purpose</b>	<b>Legal basis</b>	<b>Personal Data used for the processing purpose</b>
Handling pre-contractual negotiations and communications and concluding the Terms, including creating an account	<p>If you as a natural person wish to become partner or driver: taking and implementing the pre-contractual measures of the potential Terms to be concluded between you and us</p> <p>If the legal entity you work for or represent wishes to become partner: our legitimate interest in taking and implementing pre-contractual measures of the potential Terms to be concluded between the legal entity and us</p>	Main Data, Communication Data
Carrying out verification	<p>Performance of the Terms concluded between us</p> <p>Performance legal obligations</p> <p>Your consent</p>	Main Data, Verification Data
Performing the contract and managing contractual relationship, including managing your account, showing you nearest available vehicles according to your location, receiving payments, conducting pay-outs, providing customer support, including keeping you informed about the Services and providing roadside assistance, monitoring the fulfilment of the Terms, including blocking account and/or terminating Terms	<p>If you as a natural person are already a partner or driver: performance of the Terms concluded between us</p> <p>If the legal entity you work for or represent is already a partner: our legitimate interest in performing the Terms concluded between the legal entity and us</p>	Main Data (your geographical location processed only when the App is activated and open), Payment Data, Verification Data, Communication Data, Vehicle System Data

Ensuring that the rented vehicle is operated in accordance with the Terms by tracking and gathering information about the vehicle and the ride, including for us to bill correctly, recharge batteries and maintain our fleet	<p>Performance of the Terms concluded between us</p> <p>Performance of legal obligations</p> <p>Our legitimate interests in ensuring the protection of vehicles and other assets, including road traffic safety</p>	Main Data, Vehicle System Data
Sending you information about our Services' updates	Our legitimate interest in informing our partners and drivers about the Service's updates	Main Data
Responding to your enquiries and requests submitted via the Website, App, social media platforms, e-mail or phone	<p>If you are interested in our Services: legitimate interest in ensuring effective relationship management with potential partners and drivers and other interested parties</p> <p>If you as a natural person wish to become or are already our partner or driver: taking and implementing the pre-contractual measures of the potential Terms to be concluded between you and us or performing the Terms concluded between us</p> <p>If the legal entity you work for or represent wishes to become or is already our partner: our legitimate interest in taking and implementing pre-contractual measures of the potential Terms to be concluded between the legal entity and us or our legitimate interest in performing the Terms concluded between the legal entity and us</p>	Main Data, Communication Data, depending on the content of the message may include all data categories
Analysing your use of our App and Services	Our legitimate interest in improving, upgrading, and enhancing our Services	Usage Data
Sending newsletters and other marketing information regarding our Services	<p>Consent given upon subscribing to our newsletter</p> <p>Our legitimate interest in informing you about Services and information that we consider may be of interest to you</p>	Marketing Data
Administering newsletter subscription list	Our legitimate interest in ensuring valid legal basis for sending newsletters and recording given and withdrawn consents (subscriptions)	
Carrying out marketing competitions	Consent	
Making available the basic functions of the Website, App and the Services and administering it, including gathering information about visitor's navigation; enabling	Our legitimate interest in providing the Website, App and the Services and understanding use patterns to be able to improve the Website, App and the	Log Data, Technical Data, Usage Data

to customise or personalise experience	Services and enhance the user experience	
Diagnosing and repairing problems with the Website, App and the Services	Our legitimate interest in providing data security and preventing fraudulent actions related to the Website, App and the Services; ensuring the functioning of the Website, App and the Services	
Keeping internal records for administrative purposes	Our legitimate interest in providing the Services and ensuring our proper economic activity  Performance of legal obligations	All data categories
Managing, collecting and/or submitting for collection debts for unpaid Services and financial damage caused to us	Our legitimate interests in administering debts, conducting damage management and ensuring the collection of fees for the Services provided	
Protecting the property and interests of ourselves, partners and third parties	Our legitimate interest in preventing fraud	
Storing information containing Personal Data in our backup systems	Our legitimate interest in ensuring the continuity and security of data processing operations	
Complying with legal or regulatory obligations or requests, including creating and managing accounting documents, conducting periodic checks of the validity of the driver's licence	Performance of legal obligations	
Disclosing data to public sector authorities, supervisory and law enforcement authorities	Performance of legal obligations  Our and third parties legitimate interest in making sure that the fine received for the violation is forwarded to the driver who committed the violation	
Disclosing data to our service providers, contractors, sub-contractors, group entities	Our legitimate interest in providing the Website, App and Services and ensuring our proper economic activity	
Arranging the sale or merger of our company and providing information for conducting the legal or other audit and the data exchange thereof; disclosing data to legal successors and/or potential acquirers of the company	Our legitimate interest in facilitating proper due diligence process and business continuity by ensuring a successful merger, acquisition or restructuring of the company	

Disclosing data to our legal service providers and establishing, exercising, or defending legal claims, whether in court proceedings or in an administrative or out-of-court procedure in relation to our, our clients' or employees' rights	Our legitimate interest in facilitating effective establishment, exercise, or defence of legal claims	
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## 5 RECIPIENTS OF PERSONAL DATA AND DATA TRANSFERS

**5.1** We disclose your Personal Data to third parties only in accordance with this Notice and to who have undertaken to observe confidentiality or are subject to statutory confidentiality. Your Personal Data will be disclosed to our employees who due to their tasks must process your Personal Data.

**5.2** We may disclose your Personal Data to separate controllers or processors, who process your Personal Data on our behalf. These data recipients belong to the following categories:

Category	Purpose of disclosure
Public sector authorities, supervisory and law enforcement authorities	To fulfil our statutory obligation, a court order, to establish, exercise or defend our legal rights or in other cases where this is necessary to prevent and deter unlawful acts. For example: Estonian Tax and Customs Board, Estonian Police and Border Guard Board.
Professional advisors	To ensure our proper economic activity and to establish, exercise or defend our legal rights. For example: auditors, legal advisors, accounting service providers.
Service providers, contractors, sub-contractors	To help us in providing the services to you. For example: payment service providers (e.g., Stripe), IT service providers, including data storage, hosting and server providers, verification service providers (e.g., Veriff), ad networks, analytics, error loggers, debt collectors, credit reporting agencies, maintenance or problem-solving providers, marketing or advertising providers.
Group entities	To utilize common technical infrastructure and perform internal administrative tasks.
Our legal successors and/or potential acquirers of the company	To successfully transfer our business or for the purposes of merger and/or acquisition, we would include data among the assets transferred to any parties who acquire us.

**5.3** To ensure that our service providers adhere to adequate data protection standards, we have concluded with all service providers, engaged in the processing of Personal Data on our behalf as processors, written data processing agreements. For service providers located outside the European Union or the European Economic Area (“**EU/EEA**”), we use safeguards (e.g., standard contractual clauses approved by the European Commission, binding corporate rules) to ensure that a level of protection of Personal Data comparable to that applicable in the EU/EEA is applied to your Personal Data. We monitor the compliance

of our service providers with the above requirements. Upon your request we will make available further information on the safeguards applied.

## **6 PERSONAL DATA RETENTION PERIOD**

**6.1** We will store your Personal Data as long as reasonably necessary to attain the objectives stated in Section 4 of this Notice, or until the legal obligation stipulates that we do so. To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the processing purposes and whether we can achieve these purposes through other means, and applicable statutory obligations. Whilst retaining the Personal Data, we take into account the need to resolve disputes and enforce the contract between us or anonymize your Personal Data and retain this anonymized information indefinitely.

6.1.1 Main Data and Payment Data relating to transactions will be stored for 7 years from the end of the financial year they relate to. Other Main Data and Payment Data will be stored up to 3,5 years after the end of the contractual relationship.

6.1.2 Vehicle System Data will be stored up to 3 years after the end of the contractual relationship.

6.1.3 In case the legal basis for processing your Personal Data is consent and you decide to withdraw the consent, we will stop processing Personal Data for the previously communicated purpose, however, we will retain a note regarding your withdrawal for the purposes of administering your decision and our data processing activities at least for a period of 3,5 years.

**6.2** Following the retention period or if we no longer need the respective Personal Data for the purposes specified in Section 4 of the Notice, we shall destroy the respective Personal Data within a reasonable time, unless the retention of Personal Data is required to perform duties or requirements arising from the legislation or to protect against ongoing or threatened disputes.

**6.3** After the expiry of the retention period determined in accordance with Section 5 of this Notice or the termination of the legal basis for processing purpose, we may retain the materials containing the Personal Data in the backup systems, from which the corresponding materials will be deleted after the end of the backup cycle. We ensure that during the backup period appropriate safeguards are applied and the backed-up materials are put beyond the use.

## **7 YOUR RIGHTS AS A DATA SUBJECT**

**7.1** You may, at any time, exercise the following rights with respect to our processing of your personal data:

7.1.1 **Right to access:** you have the right to request access to any data that can be considered your Personal Data. This includes the right to be informed on whether we process your Personal Data, what Personal Data categories are being processed by us, and the purpose of our data processing.

7.1.2 **Right to correction:** if you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using

the details below. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading or out of date.

- 7.1.3 **Right to object:** you are entitled to object to certain processing of personal data, including for example, the processing of your personal data for marketing purposes or when we otherwise base our processing of your personal data on our legitimate interest.
- 7.1.4 **Right to restrict:** you have the right to request that we restrict the processing of your personal data if: (i) you wish to dispute the accuracy of certain personal data we are processing, such right applies until we have had the opportunity to satisfy ourselves of the accuracy of the personal data; (ii) we have been processing your personal data unlawfully, but you only request the restriction of the use of the personal data in question instead of its deletion; (iii) we no longer need the personal data for the original purposes of processing, but you still need such personal data to assert, exercise or defend against legal claims; (iv) you have objected to our processing of certain of items of your personal data until a determination is made whether or not your concerns are outweighed by our legitimate interests in processing your personal data.
- 7.1.5 **Right to erasure:** you may request your personal data to be erased if the personal data is no longer necessary for the purposes for which it was collected, or if you consider that the processing is unlawful, or if you consider that the personal data has to be erased to enable us to comply with a legal requirement. You can delete your App's user account in the App's settings.
- 7.1.6 **Right to data portability:** if your personal data is being automatically processed with your consent or on the basis of a mutual contractual relationship, you may request that we provide you that personal data in a structured, commonly used and machine-readable format. Moreover, you may request that the personal data is transmitted to another controller. Bear in mind that the latter can only be done if that is technically feasible.
- 7.1.7 **Right to withdraw your consent:** in cases where the processing is based on your consent, you have the right to withdraw your consent to such processing at any time.
  - 7.1.7.1 **Right to unsubscribe:** To unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details above or opt-out using the opt-out facilities provided in the communication.
- 7.1.8 **Complaints:** If you believe that we have breached a relevant data protection law and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. If you are not satisfied with our response to your request in relation to personal data processing or you believe we are processing your personal data not in accordance with the law, you can submit your claim to the data protection authority, e.g., in Estonia to a Estonian Data Protection Inspectorate ((in Estonian Andmekaitse Inspektsioon) at info@aki.ee (<https://www.aki.ee/>)).

- 7.2** To exercise the above rights, please contact us as specified in Section 2 of this Notice. Please note that you should supply us with adequate information for us to respond to your requests concerning the rights. Prior answering your request, we may ask you to provide additional information for the purposes of authenticating you and evaluating your request.

## **8 LINKS TO OTHER WEBSITES**

Our Website and App may link to external sites that are not operated by us; therefore, this Notice does not apply to data processing conducted by such third parties. Please be aware that we have no control over the content and policies of those sites and cannot accept responsibility or liability for their respective privacy practices. To find out more about how third parties process your personal data, please refer to the respective privacy notices of the other websites you visit.

## **9 CHANGES TO THIS NOTICE**

This Notice may be amended or modified from time to time to reflect changes in the way we process personal data, and in such case, the most recent version of the Notice will be published on this page. Please check back periodically, and especially before you provide any new personally identifiable information.

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