

Privacy Notice for Renters on Beast Rent

1. General Information

- 1.1. **Electric Beast Global OÜ**, a company incorporated under the laws of Estonia with registry code 16266059, and its affiliated entities ("**Beast**," "we," "our," or "us") provide digital tools enabling individuals ("**Renters**") to access vehicle rental services through our website <https://beast.rent/> and the mobile application Beast Rent (together, "**Beast Rent**"). A list of affiliated entities within the Beast group can be found here: <https://www.beast.rent/entities/>.
- 1.2. This Privacy Notice ("**Notice**") explains how we collect, use, store, share, and protect your personal data when you interact with Beast Rent, including vehicle rental services, third-party integrations, customer support, marketing activities, and other digital services provided through Beast Rent. It applies to all individuals who rent vehicles ("**Renters**") via Beast Rent, regardless of their geographic location. Beast is committed to complying with applicable data protection legislation, including the General Data Protection Regulation (EU) 2016/679 ("**GDPR**") and other relevant data protection laws globally.
- 1.3. While Beast implements appropriate measures to protect your personal data, Platform Users are the primary controllers of the personal data they process via Beast Rent and are responsible for ensuring compliance with applicable data protection laws.
- 1.4. **Definitions:**
 - 1.4.1. **Beast Rent:** The website, mobile application, and associated digital tools provided by Beast, enabling Renters to search for, book, access, and control vehicle rentals offered by Platform Users, including performing actions such as unlocking, locking, and managing their rentals.
 - 1.4.2. **Renters:** Individuals who use Beast Rent to rent vehicles from businesses or entities.
 - 1.4.3. **Platform Users:** Businesses or entities that use the Beast Rent Platform to offer vehicle rentals to Renters and manage related operations.
- 1.5. If you provide any personal data about third parties (e.g., co-renters or co-drivers), you must ensure you have the right to do so and that these third parties are aware of this Notice and understand how their data will be used.

2. Data Controllers

- 2.1. For specific data processing activities where both Beast and Platform Users determine the means and purposes of processing jointly, Beast acts as a joint controller. For example, if Beast and a Platform User jointly manage and monitor vehicle usage data to optimize fleet management and ensure compliance with rental agreements, both entities share responsibility for compliance. In such cases, Platform Users are primarily responsible for handling data subject requests related to rental transactions and associated services, while Beast manages requests pertaining to data processing necessary for the operation of Beast Rent itself.
 - 2.1.1. For rental-specific queries, Renters should refer to their rental agreement and contact the relevant Platform User, as outlined in Section 8.2.
 - 2.1.2. Beast remains a contact point for general data protection inquiries at privacy@electricbeast.co.

3. Categories and Sources of Personal Data

- 3.1. The following categories of personal data may be collected and processed:
 - 3.1.1. **Identity Data:** Name, date of birth, contact details (e.g., email address, phone number), and any identification data provided during the rental process.
 - 3.1.2. **Payment Data:** Information related to payments and transactions (e.g., payment card details, transaction history).
 - 3.1.3. **Verification Data:** Data used to verify your identity, such as driver's license information, biometric data (e.g., facial recognition), and the results of verification checks.
 - 3.1.4. **Renter Usage and Driving Data:** Data generated by the vehicle during the rental period (e.g., location, speed, distance, and status), enabling the management and monitoring of vehicle usage.
 - 3.1.5. **Communication Data:** Details of communications with Beast or Platform Users, including customer support inquiries.
 - 3.1.6. **Technical Data:** Information about your interactions with Beast Rent, such as device information, IP address, and usage logs.
 - 3.1.7. **Device Data:** Information collected about the device used to access Beast Rent, including device type, operating system, unique device identifiers, device settings, and geo-location data. The specific

information collected can depend on the device and software settings.

3.1.8. **Log Data:** Automatically collected data when interacting with Beast Rent, such as IP addresses, browser types, access times, visited pages, and the time spent on each page.

3.1.9. **Usage Data:** Data related to user activities on Beast Rent, such as user roles, actions performed, error logs, and other interaction details.

3.1.10. **Marketing Data:** Data related to marketing preferences, engagement activities, provided consents, and participation in promotions, surveys, or marketing communications. This may also include data obtained from publicly available sources (e.g., LinkedIn) or third parties.

3.2. Personal data may be collected directly from you or through your interactions with Beast Rent, from Platform Users, from verification and payment service providers, or from other third-party sources as permitted by law.

4. Legal Bases and Purposes of Processing Personal Data

4.1. Personal data is processed lawfully based on the following legal grounds:

4.1.1. **Performance of a Contract:** Processing is necessary for the execution of rental agreements and related services.

4.1.2. **Legitimate Interests:** To improve services, enhance security, and provide customer support.

4.1.3. **Compliance with Legal Obligations:** To comply with applicable laws and regulatory requirements.

4.1.4. **Consent:** Where required, for specific purposes such as marketing communications.

4.2. Personal data may be processed for the following purposes:

4.2.1. Managing and fulfilling rental agreements and related transactions.

4.2.2. Verifying your identity and ensuring the safety and compliance of vehicle operations.

4.2.3. Providing customer support, including responding to inquiries and resolving issues.

4.2.4. Conducting marketing activities, where appropriate consent has been provided.

4.2.5. Ensuring compliance with applicable legal and regulatory obligations.

4.3. To provide a quick reference and enhance readability, the table below summarizes the purposes for which we process your personal data, the legal bases that justify such processing, and the specific categories of personal data involved. This table complements the detailed descriptions provided in the numbered points above.

Processing Purpose	Legal Basis	Personal Data Used
Managing and fulfilling rental agreements	Performance of a Contract	Identity Data, Payment Data, Vehicle System Data
Customer support and inquiries	Legitimate Interests, Performance of a Contract	Communication Data, Identity Data
Verifying driver identity and eligibility	Compliance with Legal Obligations, Legitimate Interests	Verification Data, Identity Data
Marketing and promotional activities	Consent, Legitimate Interests	Marketing Data, Communication Data
Improving Beast Rent services and user experience	Legitimate Interests	Device Data, Usage Data, Log Data
Legal compliance and regulatory requirements	Compliance with Legal Obligations	All relevant data categories

This table serves as a quick reference guide to help you better understand the various purposes and legal grounds for which your personal data is processed, alongside the specific types of data involved.

5. Sharing of Personal Data

5.1. Personal data may be shared with the following categories of recipients:

5.1.1. **Platform Users** (as defined in Section 1.4.3) are primary controllers for rental transactions. Platform Users may receive and process personal data as necessary for managing vehicle rentals and related services.

- 5.1.1.1. **Data Transfers Between Platform Users:** In scenarios where Renters rent vehicles from multiple Platform Users or transfer rental services across locations, personal data may be shared securely between relevant Platform Users. Such transfers are governed by strict agreements ensuring compliance with applicable data protection laws.
 - 5.1.2. **Service Providers:** Third-party vendors that provide payment processing, identity verification, IT support, and other services on behalf of Beast or Platform Users.
 - 5.1.3. **Regulatory and Legal Authorities:** Data may be shared with public authorities, supervisory bodies, or law enforcement agencies to comply with legal obligations or in response to lawful requests.
 - 5.1.4. **Affiliated Entities:** Within the Beast group to support business operations and service delivery.
 - 5.1.5. **Verification Service Providers:** Entities that assist in verifying the identity and eligibility of Renters, such as driving license verification providers.
 - 5.1.6. **Analytics and Marketing Partners:** Third parties that provide analytics and marketing services, including advertising networks and social media Beast Rents, to improve our services and conduct marketing activities.
 - 5.1.7. **Transfer of Rights:** In the event of a sale, merger, acquisition, or any other transfer of our assets, the rights and obligations under this Privacy Notice will transfer to the acquiring or successor entity. We will notify Renters of such changes through appropriate means, including email or in-app notifications.
- 5.2. Beast requires all third-party service providers, including verification, marketing, and analytics partners, to adhere to strict data protection standards. These are enforced through binding data processing agreements, which specify the purposes for data processing and require providers to implement robust technical and organizational safeguards (e.g., encryption, secure storage, and access controls). For transfers outside the EU/EEA, Beast ensures compliance with EU data protection laws through Standard Contractual Clauses (SCCs) and additional safeguards where necessary.
- 5.3. Beast actively monitors these third parties to ensure ongoing compliance with our data protection standards. This includes regular audits, assessments, and reviews of their data handling practices. In cases where a third-party provider fails to meet

these standards, we reserve the right to terminate our agreement with them and take any further necessary actions to protect your personal data, such as reporting the non-compliance to relevant authorities or pursuing legal remedies.

6. Data Retention

- 6.1. Personal data will be retained only for as long as necessary to fulfill the purposes outlined in this Notice or as required by applicable laws:
- 6.1.1. **Rental Data:** Retained for the duration of the rental agreement and for an additional period as required by local regulations, generally up to 3 years.
 - 6.1.2. **Payment Data:** Retained for up to 7 years to comply with financial and tax reporting obligations.
 - 6.1.3. **Verification Data:** Retained for the period necessary to verify the identity and eligibility of the Renter, generally not exceeding 3 years.
 - 6.1.4. **Communication Data:** Retained for as long as necessary to manage customer relationships, generally up to 2 years after the last interaction.
 - 6.1.5. **Marketing Data:** Retained until consent is withdrawn or up to 3 years after the last marketing activity.
 - 6.1.6. **Vehicle System Data:** Retained for up to 3 years from the date of collection for operational and security purposes.
- 6.2. For enhanced readability, the table below provides a concise summary of the retention periods for different categories of personal data. It is intended to complement the detailed descriptions provided in the numbered points above, allowing for an easy overview of how long we retain each type of data.

Data Type	Retention Period
Renter Rental Data	Duration of rental agreement + up to 3 years
Renter Payment Data	Up to 7 years (for financial and tax compliance)
Renter Verification Data	Up to 3 years (for identity and eligibility verification)
Renter Communication Data	Up to 2 years after the last interaction

Renter Marketing Data	Until consent is withdrawn or up to 3 years after activity
Renter Usage and Driving Data	Up to 3 years from the date of collection

Refer to this table for a quick overview of our data retention practices and the periods for which different types of personal data are maintained.

- 6.3. Once the retention period expires or data is no longer needed, it will be securely deleted, **unless retention is required to comply with ongoing legal obligations.**

7. Security Measures and Data Protection Practices

- 7.1. We employ appropriate technical and organizational measures to protect your personal data from unauthorized access, alteration, disclosure, or destruction. These measures include, but are not limited to, data encryption, access control mechanisms, regular security audits, employee training, and policies to manage data access and use.
- 7.2. All data processing activities are conducted under strict data protection agreements with our service providers, ensuring that they adhere to our data protection standards and applicable legal requirements.

8. Your Rights as a Data Subject

- 8.1. As a data subject, you have the following rights under applicable data protection laws:
- 8.1.1. **Right to Access:** Submit a request specifying the data you wish to access. Provide proof of identity and any additional information required to locate the relevant data.
 - 8.1.2. **Right to Rectification:** Contact us with the specific details of the data that needs correction, along with supporting documents if applicable.
 - 8.1.3. **Right to Erasure:** Submit a request stating the reasons for data deletion, such as the data no longer being necessary or processing being unlawful.
 - 8.1.4. **Right to Restriction:** Request a restriction by providing specific circumstances, such as a dispute over data accuracy.
 - 8.1.5. **Right to Data Portability:** Contact us to request a copy of your data in a structured, machine-readable format. Specify the data

categories you want to transfer and provide details of the new controller.

8.1.6. **Right to Object:** Submit a request specifying the processing activity you object to and provide reasons related to your situation.

8.1.7. **Right to Withdraw Consent:** For processing based on consent, use the unsubscribe options provided in marketing communications or contact us directly.

8.2. Please contact Platform User (as defined in Section 1.4.3) directly for data subject requests, or reach out to Beast at privacy@electricbeast.co. Additional information may be required to verify your identity and process your request.

9. Cookies and Tracking Technologies

9.1. Beast Rent uses cookies and similar technologies to enhance your experience and analyze usage. These may include necessary cookies (for the operation of the site), functional cookies (to remember your preferences), analytical cookies (to measure website performance), and marketing cookies (to personalize ads and content). For more details, please refer to our Cookie Notice: <https://beast.rent/cookie-policy/>.

10. Changes to This Privacy Notice

10.1. This Privacy Notice may be updated periodically to reflect changes in our data processing practices or to reflect changes in ownership resulting from a sale, merger, acquisition, or any other form of corporate restructuring or transfer of ownership.

10.2. Significant updates to this Privacy Notice will be communicated to Renters through appropriate channels, such as email or in-app notifications.

10.3. The latest version will be published here. You are encouraged to review this Privacy Notice periodically for the latest updates.

10.4. This Privacy Notice shall be governed by the laws of Estonia and applicable European Union legislation. Any disputes arising under this Notice shall be subject to the exclusive jurisdiction of the Harju County Court in Estonia.

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