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#### Privacy Policy of CarFree Sp. z o.o.

The Privacy Policy contains the principles of use and tools for data of users of services offered by CarFree Sp. z o.o., which are collected directly from them or via cookies and technologies.

#### Data Controller and Contact Information

The data controller of your personal data, as well as of individuals authorized to drive the vehicle, is CarFree Sp. z o.o., headquartered in Warsaw, ul. Cybernetyki 5, registered in the National Court Register under KRS number: 0000556022, NIP: 5213695626, REGON: 36138861600000.

#### Wykorzystywanie plików cookies oraz podobnych technologii

- The website does not automatically collect any information, except for information contained in cookies.
- Cookies are IT data, particularly text files, stored on the end device of the Website User and intended for use on the Website's pages. Cookies usually contain the name of the website they come from, the time they are stored on the end device, and a unique number.
- The entity placing cookies on the end device of the Website User and accessing them is the Website operator: CarFree Sp. z o.o., ul. Cybernetyki 5, 02-677 Warsaw.
- Cookies are used for:
  - Adapting the content of the Website's pages to the User's preferences and optimizing the use of websites; in particular, these files allow recognizing the Website User's device and appropriately displaying the website, tailored to their individual needs;
  - Creating statistics that help understand how Website Users use websites, enabling the improvement of their structure and content;
  - Maintaining the Website User's session (after logging in), thanks to which the User does not have to re-enter their login and password on each subpage of the Website.
- The Website uses two basic types of cookies: "session" cookies and "persistent" cookies. "Session" cookies are temporary files stored on the User's end device until logging out, leaving the website, or turning off the software (web browser). "Persistent" cookies are stored on the User's end device for the time specified in the cookie parameters or until they are deleted by the User.
- The Website uses the following types of cookies:
  - "Necessary" cookies, enabling the use of services available on the Website, e.g., authentication cookies used for services requiring authentication on the Website;
  - Cookies are used to ensure security, e.g., used to detect abuses in the field of authentication on the Website;
  - "Performance" cookies, enabling the collection of information on how the Website's pages are used;
  - "Functional" cookies, allowing "remembering" the settings selected by the User and personalizing the User interface, e.g., in terms of the selected language or region the User comes from, font size, website appearance, etc.;
  - "Advertising" cookies, enabling the delivery of advertising content more tailored to the User's interests.
- In many cases, the software used for browsing websites (web browser) by default allows the storage of cookies on the User's end device. Website Users can change cookie settings at any time. These settings can be changed, in particular, to block the automatic handling of cookies in the web browser settings or to inform about each time they are placed on the User's device. Detailed information about the possibilities and ways of handling cookies is available in the software (web browser) settings.
- The Website operator informs that restrictions on the use of cookies may affect some functionalities available on the Website's pages.
- Cookies placed on the User's end device and used may also be by advertisers and partners cooperating with the Website operator.
- More information about cookies is available in the "Help" section in the web browser menu.

#### Source of Data

1. If you have contacted the Data Controller, the data was provided to us directly by you.
2. If your data was provided in connection with a matter handled by a person who directed this matter to the Data Controller, then the source of the data is that person. In such a case, the Data Controller receives identification, address, and case-related data, such as a description of the matter.

#### Purpose and Legal Basis for Processing Personal Data

The collection of your personal data and its further processing is necessary for:

- Preparing and executing a contract with you (Article 6(1)(b) and (c) of the GDPR),
- Cooperation with our partners (Article 6(1)(f) of the GDPR),
- Enabling the handling of payment cards (Article 6(1)(b)),
- Facilitating communication between you and CarFree Sp. z o.o., particularly to facilitate contact regarding your inquiries, comments, and reported issues (Article 6(1)(f) of the GDPR).

Based on Article 6(1)(f) of the GDPR, your personal data may also be processed for: realizacji obowiązku prawnego (przechowywanie umów, faktur, ksiąg rachunkowych),

- Fulfilling legal obligations (storage of contracts, invoices, accounting books),
- Preventing crimes and misuse of our services in a manner inconsistent with the law and our regulations,
- Pursuing claims and defending against claims, including debt collection,
- Complying with court orders, laws, police, and other state authorities,
- Business contacts within the legitimate interests of the data controller,
- Conducting analyses of our activities for development, statistics, and archiving purposes.

Your personal data may also be processed for marketing purposes, mainly for sending offers and advertising messages.

**Please remember that all data is provided voluntarily, but is necessary to conclude a contract between you and our company.**

#### Right to Withdraw Consent

You may withdraw your consent to the processing of contact data at any time by contacting the Data Controller. Withdrawal of consent may hinder or prevent contact with you. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

#### Obligation or Voluntariness of Providing Data

1. Providing your data for purposes related to the contract is voluntary but necessary. Failure to provide it may hinder or prevent the conclusion of the contract.
2. Providing data necessary for statistical analysis of users of services offered by CarFree Sp. z o.o. is voluntary. You may use the so-called incognito mode to browse the site without providing the Administrator with information about your visit. Using incognito mode, and thus not providing data, does not affect the possibility of using the Site.

#### Rights Under the GDPR Regarding Processed Data

You have the right to:

- Request access to your data from the Data Controller and receive a copy of it (Article 15 of the GDPR);
- Request the Data Controller to rectify or correct data (Article 16 of the GDPR) – regarding the request to rectify data when you notice that the data is incorrect or incomplete;
- Request the Data Controller to delete data (Article 17 of the GDPR);

## Right to Erasure ("Right to Be Forgotten")

The data subject has the right to request the data controller to delete personal data concerning them without undue delay, and the data controller has the obligation to delete personal data without undue delay if one of the following applies:

- The personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- The data subject withdraws consent on which the processing is based according to Article 6(1)(a) or Article 9(2)(a), and there is no other legal ground for the processing;
- The data subject objects to the processing pursuant to Article 21(1), and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);
- The personal data have been unlawfully processed;
- The personal data must be erased to comply with a legal obligation in Union or Member State law to which the data controller is subject;
- The personal data have been collected in relation to the offer of information society services referred to in Article 8(1).

If the data controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:

- For exercising the right of freedom of expression and information;
- For compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- For reasons of public interest in the area of public health in accordance with Article 9(2)(h) and (i) and Article 9(3);
- For archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes in accordance with Article 89(1), in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing;
- For the establishment, exercise, or defense of legal claims.
- Request the Data Controller to restrict processing (Article 18 of the GDPR) – e.g., when you notice that the data is incorrect – you may request to restrict the processing of your data for a period allowing us to verify the accuracy of the data);
- Lodge a complaint regarding the processing of your personal data by the Data Controller to the President of the Personal Data Protection Office.

## Scope of Collected Data

During the reservation process:

We ask for:

- First and last name,
- Phone number,
- Email address.

These are the necessary data to carry out the vehicle reservation process.

Additionally, if payment by card is selected during the reservation, we will also ask for:

- Type of credit card,
- Card number,
- Card expiration date,

which will allow us to process the payment for the service.

Confirmation of the reservation also requires providing a series of data concerning the vehicle user:

- First and last name,
- PESEL number,
- Registered address,
- Identity document number,
- Driving license number (number 5 on the document).

The above-mentioned personal data will be stored in our customer database. This will enable us to more efficiently process future reservations.

We also collect location data of the rented vehicle and the route taken.

## Recipients of Your Personal Data

Recipients of your data may include individuals authorized by CarFree Sp. z o.o. to process personal data – our employees, collaborators, partners, suppliers, service providers, and authorities authorized under the law to obtain information about personal data (e.g., Police). Data is transferred solely to perform and execute our services to the extent necessary to perform a given activity.

Please remember that by concluding a Rental Agreement with CarFree Sp. z o.o., the Lessee and the person authorized to drive the vehicle consent to the processing of their personal data for the purpose of providing services electronically, providing vehicle rental services, and for marketing purposes.

## Data Retention Period

Your personal data will be stored until you withdraw your consent or until the Agreement is fulfilled, and subsequently until the expiration of the limitation period for any claims arising from its execution.

Data related to website traffic analysis collected through cookies and similar technologies may be retained until the cookie expires. Some cookies do not expire, therefore, the data retention period will be equivalent to the time necessary for the controller to fulfill the purposes for which the data is collected, such as ensuring security and analyzing historical website traffic data.

## Transfer of Data to a Third Country or International Organization

The controller may transfer user data to providers based in a third country in connection with the use of tools for statistical, reporting, and advertising purposes, which store personal data on servers located in third countries, particularly in the USA. These providers ensure an adequate level of personal data protection through compliance mechanisms provided for under the GDPR, in particular by participating in the Privacy Shield program or using standard contractual clauses. These providers do not use the collected data to identify users, nor do they combine this information to enable identification.