

PRIVACY AND COOKIES POLICY

June 5, 2018 version

PRIVACY POLICY

Bluecity (UK) Ltd is committed to protecting and respecting your privacy.

This policy, together with the Website Terms of Use sets out the basis on which we will process any personal data we collect from you or that you provide to us through your use of the Bluecity service, the Bluecity app (“**App**”) and our website. Please read this policy carefully to understand our views and practices regarding your personal data and how we will treat it.

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For the purpose of the Data Protection Act 1998 (“**DPA**”), the data controller is Bluecity (UK) Ltd whose data protection registration number is ZA172709.

How We May Hold Your Information

We may collect and process the following information about you:

- **Information you give us.** You may give us information about you:
 - by filling in forms on our Website or App. For instance, if you sign up as a member of the Bluecity scheme, you will share your personal information with us, including your name, e-mail address and payment card details or other payment details (which you must provide in order to sign up), your driver’s licence number, your company name (if applicable), telephone numbers, address and any other details you may provide on your membership application form;
 - if you contact or correspond with us (for example, by email, phone, using the “help” button facility inside the Bluecity vehicle or on a charge point (where applicable), through the App, text message or otherwise) and we may keep a record of that correspondence (either directly or through our service providers).

*Please note information marked with an asterisk above is “sensitive” personal data, as defined in the DPA. Please see the section on Sensitive Personal Data below for information on how we treat this data.

- **Information we collect about you.** Each time you use the Bluecity service, our Website or our App we may automatically collect the following information:
 - when you use a Bluecity vehicle, we will keep a record of the details of that usage, and any associated reservation, including the date, time, location, mileage and duration of the usage and any other details of the services we provide to you. Similarly, if you make a reservation for a Bluecity vehicle we will keep a record of the details of that reservation;
 - any traffic or parking contraventions that you carry out when using the Bluecity service;
 - where you are using the Bluecity service as a member of, or an employee of, an organisation that is a corporate customer of Bluecity, we will obtain information about you from our customer organisation.

- any comments, opinions and/or feedback you provide to us regarding the Bluecity scheme and your use of our services and/or during any evaluation period that you may be asked to participate in;
 - technical information about your computer or mobile device for system administration and analysis, including your IP address, unique device identifiers, operating system, wireless network interface, device telephone number and network and browser type;
 - details of your use of the App including, but not limited to, traffic data, location data, your frequency or duration of use; and
 - information about your visit to our website and browsing activity, including the full URL information, products you viewed and length of visits to certain pages. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.
 - customer service call records, are used by Bluecity to manage its relationship with subscribers and users, to provide and improve the quality of the Bluecity service (including subscription, Bluecity's vehicle management, assistance, back-up, customisation of services, Bluecity's call centre agent training, claims management, etc.) and to handle claims and litigation files.
- **App permissions.** In order to use some of the functions provided by the App, it may request access the following features of your mobile phone:
 - Access to photos, content, multimedia, files, to allow the App to scan your subscriber and user documents (driver's licence, passport...) and / or select them from your mobile phone's memory for the strict purpose of the use of the Service.
 - Access to the list of contacts registered on your mobile phone to allow the App to retrieve the address of a contact in the list in order to locate it on the Service map, or to pre-fill the registration form to subscribe to the Service.
- **App location information.** In order to use some of the functions provided by the App (such as locating a charge point) we use an application program interface which uses GPS, Wifi and mobile network information technology to determine your current location when using the App. When you first open the App, we will ask you for your consent to use your location data for this purpose. When you are not using the App we do not collect location data. You can withdraw your consent at any time by changing your location data settings on your mobile device, but this will affect your ability to use the Service.
- **Information we collect from the Bluecity vehicle.** The Bluecity vehicles include activated services and telematics technology that records and sends diagnostic system and location data to us. For instance, this includes:
 - Global Positioning System (GPS) vehicle tracking technology. GPS is a network of satellites that allows us to determine the location (latitude and longitude) of the Bluecity vehicle; and
 - a number of sensors which help us to identify when there is a fault with the vehicle. These sensors also collect and record numerous vehicle parameters and data, including vehicle speed and driver behaviour. This information is transmitted to Bluecity and temporarily stored (including while the vehicle is hired to you).
 - **Information we receive from other sources.** We work closely with third parties (including for example, business partners, other companies within our group, subcontractors in technical and payment services, analytics providers, search information providers, fraud prevention agencies) and may receive information about you from them.

We may also collect details relating to your driving licence and driving history from third parties,

such as the DVLA, in order to check your eligibility to use the Bluecity service.

How We Use Your Information

We may use the information we hold about you in the following ways:

- **Information you give to us.** We will use this information to:
 - process your application to become a member of the Bluecity scheme;
 - facilitate your ability to reserve, use and return Bluecity vehicles and check your eligibility to use the Bluecity service;
 - process payment of membership and other fees;
 - carry out our obligations arising from any contracts entered into between you and us and to provide you with information, products and services you request from us;
 - send you our periodic newsletter and information about our services via email, text message or other electronic means (although you have the ability to opt out of receiving these types of communications by contacting us using the details provided below or clicking the relevant link on the communication itself);
 - email or text message you for your feedback on our services and to help us evaluate and improve our services, for example by acting on any information you have provided to us;
 - notify you about changes to our Website, App and/or services;
 - deal with any enquiries, correspondence, concerns or complaints you have raised; or
 - deal with any enquiries, correspondence, concerns or complaints from third parties involving you and any issues caused by your use of the Bluecity service (for example where you have improperly parked while using the Bluecity service).

- **Information we collect about you.** We will use this information to:
 - to administer and improve our Website and our App;
 - for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - as part of our efforts to keep our Website and App safe and secure;
 - to make suggestions and recommendations to you and other users of our Website and App about products or services that may interest you or them; or
 - to compile reports (which do not personally identify you) of usage of the Bluecity service.

- **Information we receive from other sources.** We may combine this information with the information you give to us or we collect about you and use this information as specified above.

- **Information we collect from the Bluecity vehicle.** Bluecity uses this information for a variety of important purposes. For example, we use GPS and telematics data to help you find a Bluecity vehicle you have reserved, to provide roadside assistance when you need it, to ensure that a Bluecity vehicle is available at the place and time you have reserved it, to alert us when a Bluecity

vehicle is likely to be returned late, to locate lost or stolen Bluecity vehicles, to provide satellite navigation services to the user and to provide evidence to our insurers in relation to the resolution of any insurance claim that we or you make. We do not actively track or monitor vehicle location, driver behaviour or speed.

- **Bluecity Membership Card.** Where we issue you with a Bluecity membership card to facilitate your use of the service as a Bluecity member, this card will have printed your name and membership number, and should be kept safe. Please see the 'Security of Information' section below.

Disclosure of Your Information. We may share your information with selected third parties in accordance with this policy, including:

- service providers, for example of IT services, business partners, suppliers and/or sub-contractors, such as payment service providers, for the performance of any contract that we enter into with you;
- government, parking authorities or other law enforcement agencies, in connection with the investigation of unlawful activities or for other legal reasons, including in connection with a parking, speeding or other driving related contravention;
- companies within our group and other service providers in order to provide the Bluecity services to you and to verify your identity and vehicle details (for example, when you use the Bluecity service to reserve, use and/or to return a Bluecity vehicle, we may need to share your personal information, such as your membership card and Bluecity pin number);
- our insurers in relation to our insurance cover for the Bluecity service and/or in connection with an incident or accident that may occur with a Bluecity vehicle;
- other service providers as follows:
 - if you make a reservation to collect or return a Bluecity vehicle, we will disclose the information you provide to us to our service providers that operate the network of parking bays and charge point infrastructure that we use. This information will also be processed on computer systems used by us and/or them to facilitate the operation of these services; and
 - the registration number of Bluecity vehicles are disclosed to our service providers (for example providers of charge point infrastructure and certain parking service providers, as well as providers of vehicle repair and towing services) in order to facilitate the services that we provide to you.

We may disclose your personal information to third parties:

- in other circumstances in which Bluecity believes the Website, the App, the Bluecity service or our vehicles are being or has been used in violation of the applicable law or otherwise in the commission of a crime;
- when we have a good faith belief that there is an emergency that poses a threat to the safety of you or another person; or when necessary to protect the rights or property of Bluecity or third parties;
- if we sell or buy any business assets or receive investment into our business, we may disclose your personal data to the prospective or actual buyer, seller or investee of such business or assets; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal

obligation, or in order to enforce or apply our Website Terms of Use or other contracts between us and you; or to protect the rights property or safety of us, our customers or others.

Except as explained above, we will not disclose your personal data to any third parties for any other purpose unless we have your consent or we otherwise legally have the right or obligation to do so (for example, in an emergency).

We require our service providers to comply with data protection laws whenever they process your personal information.

Sensitive Personal Data

Some of your personal data processed by us may be classified as "sensitive" under the DPA. This may include any driving convictions and/or penalties you may have received and any medical conditions which may affect or may be associated with your ability to drive a vehicle.

If you disclose sensitive personal information to us, we will use that information for the purpose(s) given to you at the time the information was collected or for purposes consistent with your reasons for giving us this sensitive personal information.

We may use information relating to any driving convictions and/or penalties you may have for the purposes of evaluating your admission to the Bluecity scheme, or for evaluating whether to allow you to continue as a member of the Bluecity scheme.

We will only share your sensitive personal data with other third parties without your consent if we have a legal basis to do so.

International Data Transfers

The information that we collect from you may be transferred to, processed and stored at, a destination outside the European Economic Area ("**EEA**"). By submitting your information to us, you agree to this transfer, processing and/or storing. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this privacy policy.

Security of Information

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Website or App, or a Bluecity membership card and pin to access the Bluecity car and/or charge points, you are responsible for keeping this password, membership card and pin number confidential. You must not share these details with anyone, or store it in a way that may allow a third party to access it.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Website or App and you acknowledge that any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features which are appropriate to the type of personal data you have provided to try to prevent unauthorised access or inadvertent disclosure.

Status of this Policy and Your Consent

For some of the uses of your information described above there is a legal basis under the DPA for us to use the information without your consent. This includes, for example, legitimate provision of information to service providers acting on our behalf. Where this is the case, this privacy policy fulfils our duty to process information fairly, which includes giving you appropriate notice and explanation of the way in which your information will be used.

Where consent is required for our use of your information, by submitting your information to us you consent to our use of that information as set out in this policy; and if you disclose someone else's information to us, you confirm that you have their consent to disclose this information to us and for us to use and disclose it in accordance with this policy.

If you provide us with your sensitive personal data (for example, your state of health or any disabilities) you expressly consent to us using that data and disclosing it to our service providers for the purpose given. If you disclose someone else's sensitive personal data to us you confirm that you have their consent to disclose this information to us and for us to use and disclose it to the relevant service providers for the purpose given.

Retaining your information

We will retain the information we receive and collect about you we receive and collect about you for period which is reasonably required for us to use it in accordance with this Privacy Policy or in accordance with our legal rights and obligations.

Except for litigation or judicial requisition (with restricted access to the services concerned) and before archiving for compliance with legal and regulatory obligations of Bluecity, in particular for the duration of the prescription of actions that may arise from the use of the Bluecity service, most of the personal data collected are kept on an operational basis until 3 years after the end of subscriptions and up to 7 years in archiving with restricted access.

Data relating to simple prospects are kept for 1 year from the last contact, without subsequent archiving.

By exception, but still except for litigation or judicial requisition (with restricted access to the services concerned):

- recordings of subscription-related calls and emergency calls are kept for 90 days, without subsequent archiving,
- data relating to driving licence and identity documents are kept 1 year after the end of subscriptions,
- the registration data in payment incident are kept until regularization, without subsequent archiving,
- the contravention collection management data are kept for 1 year from receipt of the contravention notice and up to 18 months in archiving with restricted access,
- vehicle geolocation and telemetry data for 3 months and up to 5 years in archiving with restricted access.

In the event of litigation or judicial requisition, the retention periods are extended until the situation is cleared or the legal actions are prescribed, with restricted access only to Bluecity services that need to investigate and process the files concerned.

Your Rights

You have the following rights in regards to your personal information:

- **Access.** You have the right to access information about the personal data we hold about you. Your right of access can be exercised in accordance with the DPA.

Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the personal data we hold about you, and we will require you to prove your identity before we release any personal information to you (for example, by providing photographic identification).

In accordance with current European regulations (General Data Protection Regulation – GDPR), subscribers and users have the following rights:

- Right of access (article 15 GDPR) and rectification (article 16 R GDPR), updating, data completeness;
- Right to erase data (Article 17 GDPR) when they are inaccurate, incomplete, ambiguous, out of date, or whose collection, use, communication or storage is prohibited ([learn more](#));
- Right to withdraw consent at any time (section 13(2)(c) GDPR);
- Right to limit the processing of data (Article 18 GDPR) ([learn more](#));
- Right to object to the processing of data for legitimate reasons (Article 21 GDPR) ([learn more](#));
- Right to the portability of data provided by subscribers and users, when such data have been subject to automated processing based on their consent or on a contract (Article 20 GDPR).

If you would like to exercise one of these rights, please contact us. You may email us at datacontroller.Bluecity@bollore.net or alternatively, write to us at Bluecity (UK) Ltd, FAO Data Controller Officer, 5 Cavendish Square, London, W1G 0PG.

You must indicate in your request which personal data you would like Bluecity to correct, update or delete. **All applications must be accompanied by a copy of the applicant's identity document (valid identity card or passport).**

Requests for deletion are however subject to the obligations imposed by law on Bluecity, in particular as regards the conservation or archiving of documents.

- **Complaints.** If for any reason you are not happy with the way that we have handled your personal information you have the right to make a complaint to the Information Commissioner's Office.
- **Marketing.** As detailed above, you have the ability to opt out of receiving marketing communications from us and the other companies within our group by contacting us using the details provided below or clicking the relevant link in the communication itself.

External Websites

The Website and App may, from time to time, contain links to external websites. If you follow a link to any external websites, please note that these websites have their own privacy policies and website terms and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any information to any external websites.

Changes to this Privacy Policy

Any changes we may make to our privacy policy will be posted on this page and where appropriate will be notified to you by email or text message. Continued use of the Website and/or App will signify that

you agree to any such changes.

Keeping Us Updated / Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Bluecity (UK) Ltd, Bluecity (UK) Ltd, FAO Data Controller Officer, 5 Cavendish Square, London, W1G 0PG. You may also email us at datacontroller.Bluecity@bollore.net or call us on [].

COOKIES POLICY

How We Use Cookies

Cookies are small data files that we store on your browser and applied by the majority of websites you visit. Cookies contain information that is transferred to the hard drive of your computer or mobile device

Our Website and App uses cookies to distinguish you from other users. It helps us to provide you with a good experience when you browse our Website or App and also allows us to improve our Website and App.

We use the following cookies on the Website and the App:

- **Google Analytics cookies.** These cookies collect standard internet log information and details of visitor behaviour patterns to enable us to maintain and develop the Website and App. The data gathered is anonymous and does not identify individual users.
- **Strictly necessary cookies.** These cookies are required for the operation of the Website and/or App, and in particular its registration / login apparatus, operate effectively. These cookies are essential in order to enable you to sign-in to your account. These cookies do not remember where you have been on the internet. These cookies cannot be disabled.
- **Functionality cookies.** These are used to recognise you when you return to our Website or App. This enables us to personalise our content for you, greet you and remember your preferences.

Below is a list of the all the cookies we have set and our reasons for doing so:

Cookie	Use
-S	This cookie holds the session ID and expires after 4 days. This allows us to know that the user has logged in. It contains a session ID, which is not shared with any
-csrftoken	This cookie holds a security-related identifier, which allows us to verify that actions performed on the website originated from one of our pages and not from a malicious third party website protection against Cross-Site Resource Forgery attacks). This cookie is kept for 1 year , and holds a cryptographically signed security token

Cookie Consent

By using the Website or the App you accept our use of these cookies. You may control and block the cookies used by websites by modifying the settings on your browser or device. However, if you use your browser or device settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Website or App.

To access the Google Analytics opt out browser, please visit <https://tools.google.com/dlpage/gaoptout>. By choosing this option, you will block Google Analytics across all websites.

For more detailed information about cookies and how they can be managed and deleted please visit www.allaboutcookies.org.