

# Wayv - Privacy Policy

## I. Introduction

When you use Wayv, you entrust us with your personal information. We are committed to this trust. It starts with helping you understand our privacy practices.

This notice describes the personal information we collect, how it is used and shared, and your decisions about that information. We encourage you to read this in conjunction with our privacy review, which highlights key points about our privacy practices.

Last modified: June 1, 2021

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## II. Overview

### A. Scope

This notice applies to users of Wayve Services anywhere in the world, including users of Wayve applications, websites, features or other services (hereinafter Wayv).

This notice describes how Emigma d.o.o. for the purpose of operation Wayv collects and uses personal data. This notice applies to all users of our applications, websites, features or other services anywhere in the world. This notice specifically addresses:

- **Passengers:** individuals requesting or receiving transportation, including those receiving transportation requested by another individual
- **Carriers:** Individuals who operate carriers individually or through partner transport companies

All who are the subject of this notice are referred to in this notice as "users".

Our data processing procedures are governed by the laws in place in which we operate. This means that in the rules described in this notice, we only deal with a specific country or region if the laws of those places allow it. If you have any questions about our practice in a particular country or region, please contact us here or at the addresses below.

### B. Controller and data transfer

Emigma d.o.o. is the controller of personal data collected in connection with the use of Wayve Services. Questions, comments and complaints about Wayva's data practices can be submitted here. You can also use this form to send a question to Wayve's Data Protection Officer.

## III. Collection and use of data

### A. The data we collect

Wayv collects:

- information that users provide to Wayve, such as when creating an account;
- data generated while using our services, such as location, application usage, and device data.

Wayv collects the following data:

#### 1 - Data provided by users. This includes:

- **User profile:** We collect information when users create or update their Wayv accounts. This may include their name, email, telephone number, login name and password, payment or banking details (including related payment verification details), boatmaster's certificate and other national identification documents (which may indicate document numbers). and birth date, gender and photo). This also includes information about the vessel or passenger insurance, emergency contact information, user settings.
- **User Content:** We collect information that users submit when they contact Wayve Customer Support, rate or praise other users, or otherwise in contact with Wayve. This may include feedback, photos, or other footage collected by users.

#### 2 - Data generated while using our services. This includes:

- **Location information (passenger):** Wayv does not select passenger location information. Location information (carrier). Accurate or approximate location data is collected from mobile devices of carriers, if they allow us to do so. Wayv collects this data from the moment the ride is confirmed until the end and whenever the application is running in the foreground of the mobile device. We use this information to improve your use of our applications, including improving pickup locations, enabling security features, and preventing and detecting fraud.
- **Transaction information:** We collect information about transactions related to the use of our services, including the type of services requested or provided, order details, delivery information, the date and time of the service, the amount charged, the route and the method

payment name.

- **Usage information:** We collect information about how users interact with our services. This includes information such as access dates and times, application features or pages displayed, application crashes and other system activities, the type of browser and third-party sites or services used prior to interacting with our services. In some cases, we collect this information through cookies, pixels, tags, and similar tracking technologies that create and maintain unique identifiers. To learn more about these technologies, see our Cookie Notice.
- **Device data:** We may collect data about devices used to access our services, including hardware models, device IP address, operating systems and versions, software, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device movement data, and mobile network data.

### **3 - Data from other sources. This includes:**

- **Suppliers** to help us verify user identity, background information, and suitability for regulatory, safety, and security purposes.
- **Providers of insurance** , vehicles or financial services for providers.
- **Partner transport companies** (for carriers using our services through an account linked to such companies) .Publicly available resources.
- **Providers of marketing services** .

Wayv can combine data collected from these sources with other data it has.

## **B. How we use personal information**

Wayv collects and uses data to provide reliable and convenient transportation. We also use the data we collect:

- To increase the security and protection of our users and services
- For customer support
- For research and development
- Enable communication between users
- Send marketing and non-marketing messages to users
- Regarding legal proceedings

Wayv does not sell or share users 'personal information with third parties for their direct marketing, except with the consent of the users.

The data it collects, Wayv uses for purposes including:

### **1 - Offer of services and functions.**

Wayv uses the information we collect to provide, customize, maintain and improve our products and services. This includes the use of data for:

- Create and update user accounts.
- Carrier authentication.
- Enable transport.
- Processing or facilitating payment for our services.
- Track and share driving progress.
- Perform internal operations necessary to provide our services, including troubleshooting software errors and operational problems;
- to perform data analysis, testing and research;
- monitoring and analysis of usage and activity trends.

## **2 - Security and protection.**

We use personal information to maintain the security, protection and integrity of our services and users. This includes:

- Checking carriers before allowing them to use our services and at annual intervals,
- Use the device, location, profile, usage and other data to prevent, detect and combat fraud or dangerous activities.

## **3 - Customer Support.**

Wayv uses the information we collect to provide customer support, including:

- Direct questions to the appropriate customer support person
- Examine and address user concerns
- Monitoring and improving customer response and support processes

## **4 - Research and development.**

All the data we collect can be used for testing, research, analysis, product development, and machine learning to improve the user experience. This helps us to improve and enhance the security and protection of our services, improve our ability to prevent the use of our services for illegal or inappropriate purposes, and develop new features and products.

## **5 - Enable communication between users.**

For example, The driver can notify or call the passenger to confirm the pick-up location, the passenger can contact the carrier to find the lost item.

## **6 - Marketing.**

The information we collect may be used by Wayv to market its services to its users. This includes sending messages to users about Wayvr services, features, promotions, sweepstakes, studies, surveys, news, updates, and events.

#### **7 - Non-marketing communications.**

Wayv may use the data we collect to generate and provide certificates to users; inform them of changes to our terms, services or policies; or send other messages not intended for marketing the services or products of Emigma d.o.o. or its partners.

#### **8 - Litigation and requirements.**

The personal information we collect may be used to investigate or resolve claims or disputes related to the use of Wayve's services or as otherwise permitted by applicable law or at the request of regulators, government agencies, and government agencies. queries.

### **C. Cookies and Independent Technologies**

Wayv and its partners use cookies and other identification technologies in our applications, websites, emails and online advertisements for the purposes described in this notice. Cookies are small text files stored on browsers or devices by websites, applications, online media and advertisements. Wayv uses cookies and similar technologies for purposes such as:

- User authentication
- Remember user settings and preferences
- Determine content popularity
- Ensure and measure the effectiveness of your advertising campaigns
- Analyzing website traffic and trends and a general understanding of the online behavior and interests of the people who communicate with our services
- We may also allow others to perform audience measurement and analytics services for us, serve ads on our behalf on the Internet, and monitor and report on the performance of those ads. These people can use cookies, web beacons, SDKs and other technologies to identify the devices used by visitors to our websites, as well as when they visit other websites and services. For more information on the use of cookies and other technologies described in this section, see our Cookie Notice.

### **D. Data exchange and disclosure**

Some Wayve products, services and features require that we share information with or at the request of other users. We may also share information with our affiliates, branches and partners for legal reasons or in connection with receivables or disputes. Wayv can share the data we collect:

### **1 - With other users. This includes sharing:**

- Name, and passenger pick-up locations.
- Captain's name.
- Passenger name and order information.
- We also deliver invoices to passengers, which contain information such as a breakdown of the amounts charged, the name of the driver, the name of the vessel, the relation of other information required by Slovenian legislation.

### **2 - At the request of the user This includes the exchange of data with:**

- View users' locations.

For example, we share the ETA and the location of the carrier at the request of that passenger or the user's travel information.

### **3 - With the general public**

- Questions or comments from users posted through public forums on social media may be made available to the public, including any personal information included in the user's questions or comments.

### **4 - With Wayv service providers and business partners**

Wayv provides information to vendors, consultants, marketing partners, research companies and other service providers or business partners. These include:

- Payment processors and brokers
- Cloud Providers
- Google in connection with the use of Google Maps in Wayve applications (see Google's privacy policy for information on data collection and use)
- Marketing partners and providers of marketing platforms, including social media advertising services
- Data Analytics Providers
- Research partners, including those conducting research or research projects in partnership with or on behalf of Wayve
- Providers to help Wayve improve the security and security of its applications
- Consultants, lawyers, accountants and other professional service providers
- Maritime Administration of the Republic of Slovenia

### **5 - For legal reasons or in case of a dispute**

Wayv may share users' personal information if we believe it is required by applicable law, regulation, operating license or agreement, legal process or governmental requirement, or if disclosure is otherwise appropriate for security or similar concerns. This includes the exchange of personal data with law enforcement officials, public health officials, other government bodies,

airports (if required by airport authorities as a condition for the operation of airport property) or other third parties if necessary to enforce our terms of service, agreements or other policies; to protect Wayve's rights or property or the rights, safety or property of others; or in the event of a claim or dispute regarding the use of our services. If you use another person's credit card, we may be required by law to share your personal information, including travel or order information, with the owner of that credit card.

## **6 - With consent**

Wayv may share the user's personal information other than that described in this notice if we notify the user and he agrees to share.

## **E. Data storage and deletion**

Wayv stores user data for as long as necessary for the purposes described above. Users can request the deletion of their accounts at any time. Wayv may retain user information upon request for deletion for legal or regulatory reasons or for the reasons set forth in this policy. Wayv stores user data for as long as necessary for the purposes described above. This means that we store different categories of data at different times, depending on the category of the user to whom the data relates, the type of data and the purposes for which we collected the data.

Users can request deletion of their account at any time via the *Settings & gt; Privacy in the Wayv app* or through the Wayv website. Upon request to delete an account, Wayv deletes the user's account and data, unless legal or regulatory requirements require retention for security, protection and fraud prevention purposes or due to a user account issue such as an outstanding claim or dispute. Because we are subject to legal and regulatory requirements regarding carriers, this generally means that we keep their account and data for at least 7 years after the request for deletion.

For passengers, their data is generally deleted within 90 days of the request for deletion, except when storage is required for the reasons set out above.

## **F. Reasons for processing**

We only collect and use personal information if we have legitimate reasons to do so. These include the processing of the user's personal data to provide the required services and features for the purposes of Wayve's legitimate interests or the interests of other parties, to fulfill our legal obligations or with consent.

## **V. Updates to this notification**

We may update this notice from time to time. Use of our post-update services constitutes consent to the updated notice to the extent permitted by law. We may update this notice from time to time. If we make significant changes, we will notify users in advance of the changes via Wayv apps or in other ways, such as email. Users are encouraged to review this notice regularly and to obtain the latest information on our privacy practices. Following such notice, the use of our services by users in countries outside the European Union will be understood as consent to updates to the extent permitted by law.