

Privacy Notice

wigo carsharing

Effective from 2025.02.03.

Version number: 1.1

1. Introduction

Nelson Flottalízing Kft., a member of the AutoWallis Group, as the data controller (hereinafter referred to as the "**Controller**") is committed to the safeguarding and protecting the rights of its customers and all persons who have contact with it (hereinafter referred to as the "**Data Subject**") in relation to personal data.

As a mobility service provider, we offer car sharing under the name **wigo carsharing** and the corporate fleet management under the name **wigo fleet**. For the sake of transparency, we have prepared separate privacy notices for these two services and for our general data processing.

In this notice (the "**Notice**"), we set out the details of the data processing practices in relation to wigo carsharing. You can access the document describing the wigo fleet service and our general operations on our website <https://www.wigomobility.com/hu/fleet/kezdolap>.

Please note that the information in this Notice only applies to data relating to natural persons.

1.1. Data controller and contact details

Name: Nelson Flottalízing Kft.
Registered office: 1033 Budapest, Kórház utca 6-12.
Registration number: 01-09-378396

Phone number: +36 1 444 7777
E-mail address: adatvedelem@wigomobility.com

1.2. Data Protection Officer and contact details

The Data Controller, together with other companies belonging to the AutoWallis group, employs a joint data protection officer under the authorisation of Article 37(2) GDPR.

E-mail address: adatvedelem@wigomobility.com

1.3. Purpose of the Notice

The purpose of this Notice is to answer the following questions.

- what personal data we collect about you when we process your personal data,
- for what purpose and on what legal basis we do this,
- how long the personal data is stored,
- if we transfer them to someone else,
- what rights and remedies you have in relation to the processing.

1.4. General rules on data processing

Source of data

Personal data is typically obtained directly from the data subject. If we obtain your personal data through other means, we will inform you of the details of this in the specific section.

Transfers to third countries

As a matter of general business practice, we also use service providers reside outside the EEA. Due to the third country headquarters, personal data processed in these services could in some cases be transferred outside the EEA. For example, in the case of Microsoft's office software or our Facebook page, to the USA. We monitor the adequacy of these services and services from a data protection perspective on an ongoing

basis. For example, whether these service providers are registered under the EU-US data protection framework. In order to comply with our own data protection policies and procedures, we only engage with service providers that can demonstrate a proven commitment to data protection compliance.

Profiling or automatic decision-making

We do not typically use profiling or automated decision-making in our data processing. If we do, we will inform you of the details of this in the specific section.

Data processors

Our subcontractors who may have access to personal data are contractually guaranteed to comply with our instructions on data processing and the applicable data protection standards.

2. Description of each processing operation

Please find details of the data processing operations outlined below:

- 2.1. Contract preparation and performance
 - 2.1.1. Registration in the application
 - 2.1.2. Reservation, rental (base case)
 - 2.1.3. Billing
 - 2.1.4. Failure to fulfil a contractual obligation
 - 2.1.5. Abuse
 - 2.1.6. Damages in connection with the rental
- 2.2. Marketing activities
 - 2.2.1. General marketing activities
 - 2.2.2. Personalised advertising
- 2.3. Survey of satisfaction with the service or product provided
- 2.4. Sweepstakes, promotion
- 2.5. Gift card purchase
- 2.6. Use of the student discount
- 2.7. Handling complaints
- 2.8. Transmission of data by users of the Streetcrowd service

2.1. Contract preparation and performance

2.1.1. Registration in the application

Purpose and legal basis for data processing

In order to use our wigo carsharing service, you need to register in the mobile application - app. The purpose of processing of the personal data you are required to provide during registration is to provide the contracted services, to identify you and to verify the conditions necessary for the conclusion of the contract. Legal basis for processing - Article 6(1)(b) GDPR.

Biometric data (such as a special type of photo of your face) is also processed to verify your identity and assess your eligibility (to check the validity of your driving licence or for remote contracting). Biometric data is

considered specific personal data, and we require your consent for its processing. The additional legal basis for processing is Article 9(1)(a) GDPR, based on your explicit consent.

Scope of personal data processed

- Identification and contact details: name, surname, date and place of birth, address, e-mail address, telephone number.
- Bank card details.
- A photo of the front and back of the driving licence and its information: category of driving licence and expiry date,
- During registration validation, a video of the taking of the selfie will be taken.
- During the validation of the driving licence, a video of the taking of the driving licence photo is taken
- Photos you have taken and uploaded of yourself.
- Device details used for registration: device name, IMEI number, operating system details, application version number.
- User name and PIN code.
- Third-party coupon code (if any).

Please be advised that the provision of personal data is a prerequisite for the conclusion of the contract. Without this information, we are unable to provide you our car sharing service.

Retention time

Data will be deleted five years after the last user activity or before, if the user profile is deleted using the option in the application. Exceptions to the deletion of data are data that we are legally obliged to keep or that are necessary to comply with contractual obligations (for example billing data, contact details in case of debt, etc.). Data will not be stored if registration is incomplete.

We keep the video of the selfie taken during validation and the video of the driving licence for 3 months.

The data required for biometric identification and the fact of identification will be stored for a period three (3) years after the termination of our contractual relationship. The purpose of this retention period is to enable us to verify, if necessary, that you are a valid driver's licence holder.

Data processors

- Server provider
- wigo application technology provider
- Biometric identification service provider

2.1.2. Booking, rental

Purpose and legal basis for data processing

When you use our wigo carsharing service and rent a car from us, your personal data will be processed for the purpose of concluding and fulfilling the rental contract. Legal basis for processing - Article 6(1)(b) GDPR.

Scope of personal data processed

- Customer code
- Name
- Date, start and end time, duration of the rental, where the car is picked up and parked, when the central lock is closed
- GPS coordinates related to the rental
- Rental fee and payment details

- If applicable, the fact and use of the wigo extra eligibility
- In the case of discount coupons, the fact of having used the discount also implies the fact of having used the service provided by the third party entitled to the discount.
- If you use credit (for example, if you use our service as a benefit from your employer), we will continue to process the fact that you have used the credit and the details of the person who bought the credit.
- Some of our cars have rough driving, smoke and external damage sensors. The sensors are clearly visible, but their presence is noted in the car as well! The system includes two acoustic sensors that monitor for noise and sound fragments, such as a bang on the bodywork. The device does not handle human speech, only sound fragments. They are relevant in the event of damage or an accident, although the sensors are active continuously, their data is not stored. For details on data processing in case of damage, see the relevant section.

Please be advised that the provision of personal data is a prerequisite for the conclusion of the contract. Without this information, we are unable to provide you with our car sharing service.

Retention time

The data will be processed for the general retention period (5 years) following the termination of the contractual relationship, after which it will be deleted.

Data processors

- Hosting
- Information technology service provider
- E-mail service provider, customer service partners

2.1.3. Billing

Purpose and legal basis for data processing

After using the wigo carsharing service, we will issue you with an invoice to comply with accounting legislation and to make payment. Legal basis for processing - Article 6(1)(c) GDPR.

Categories of the data processed

- Name
- Address
- Customer code
- Name of service requested, date, quantity, purchase price
- Last four digits of bank card number

Retention time

In accordance with the requirements of the Accounting and VAT Act, the data is retained for a period of eight (8) years.

Data processors

- Hosting
- Information technology service provider
- Payment card transaction provider

2.1.4. Failure to fulfil a contractual obligation

Purpose and legal basis for data processing

If the service user fails to fulfil his contractual obligations, we will process personal data for the purpose of pursuing the company's claims. Legal basis for processing - Article 6(1)(f) GDPR.

You have the right to object to the processing of your personal data based on legitimate interests at any time.

Categories of the data processed

- Name
- Place and date of birth, mother's name
- Contact details: address, e-mail address, telephone number
- The fact and amount of the debt and the circumstances in which it arose
- The content of debt-related messages and other relevant information about the messages

Retention time

Until the claim has been validated or an effective protest has been lodged.

If the consequence of non-compliance with the claims results in a ban from the service, the data related to the registration will be kept in the form of a "hash". In this case the data cannot be read by us, but the IT system will not allow re-registration.

Data processor

- Hosting
- Information technology service provider
- Claim handler

2.1.5. Data processing in relation to the misuse of our service

Purpose and legal basis for data processing

In the event of a breach of the rental contract, misuse of our car-sharing service, or suspected misuse, we will process the personal data of the relevant individuals for the purposes of enforcement. The legal basis for the data processing is the legitimate interest of the data controller in enforcing legal rights and establishing liability - Article 6(1)(f) of the GDPR.

You have the right to object to the processing of your personal data based on legitimate interests at any time.

Categories of the data processed

- Data in the contract
- Fact of abuse
- In the case of a rental, the GPS coordinates, time and other relevant circumstances of the rental involved in the abuse.
- In the case of invoicing, data relevant for the normal invoice issue.

Retention time

Personal data will be stored for five (5) years following after the final conclusion of the dispute resolution or legal action or until a successful objection.

If the abuse results in a ban from the service, the data related to the registration will be kept in the form of a "hash". In this case the data cannot be read by us, but the IT system will not allow re-registration.

Data processors

- Information technology service provider

- GPS service partner

2.1.6. Damages in connection with the service

Purpose and legal basis for data processing

Even with the greatest care, damage can still occur, and this is the case with carsharing services. In such cases, we process data on the person who caused the damage in order to settle the claim. The legal basis for the data processing is the legitimate interest of the data controller in enforcing legal rights and establishing liability - Article 6(1)(f) of the GDPR.

You have the right to object to the processing of your personal data based on legitimate interests at any time.

Please note that we have installed rough driving, smoke and damage sensors in some of our cars.

Rough driving is defined as undue acceleration, braking and cornering. The system includes two acoustic sensors that monitor for noise and sound fragments, such as a bang on the bodywork. The acoustic sensors are continuously active, but conversations in the car are not recorded under any circumstances. The device does not record human voices, only sound fragments, such as a bang on the bodywork. The warning signal from the sensors is automatic, but the decision is always made by a human.

The sensors are clearly visible in our cars equipped with the sensor system, but we also draw your attention to their use!

Categories of the data processed

- Identification data in the contract
- The fact, time, place, extent and other relevant circumstances of the damage.

Retention time

Personal data will be stored for five (5) years following after the final conclusion of the dispute resolution or legal action or until a successful objection.

Data processor

- Information technology service provider

2.2. Marketing activities

We process personal data in the context of marketing enquiries sent to our customers in order to describe and promote our and our partners' services. Marketing communications may take the form of:

- **e-mail** (e.g. discounts or satisfaction measurement for the service used);
- **SMS** (e.g. discounts, news, promotions);
- **Telephone** enquiries (e.g. satisfaction surveys, research); processing
- In-app **push messages** (e.g. based on location or a specific period (holiday)).
- Show in-app advertisement

Furthermore, enquiries will provide information about the services currently available and those that are constantly expanding. We contact you with quality offers that we would be happy to receive ourselves, in line with our commitment to providing you with the best possible service.

2.2.1. General marketing activity

Purpose and legal basis for data processing

The purpose of the is the general, non-personalized marketing activities, such as sending newsletters about our wigo carsharing service and related promotions. The purposes of the processing are direct marketing

marketing communications, sending newsletters, displaying in-app advertisements and sending push messages. Legal basis for processing the Data Controller's legitimate interest in the economic benefit of marketing communications and the promotion of its services. - Article 6 (1) (f) GDPR.

You have the right to object to the processing of your personal data based on legitimate interests at any time.

Scope of personal data processed

- Name, system ID
- E-mail address

The retention period of the personal data

Until you object to the processing, but no later than the end of the contractual relationship between us.

Data processors

- Server provider
- Information technology service provider
- E-mail service provider
- In the case of advertising campaigns, the advertising agency
- Social media provider

Recipient of the transfer

AutoWallis Nyrt.

2.2.2. Personalised advertising

Purpose and legal basis for data processing

We process personal data in the course of advertising activities where we promote services and products provided by our partners and third parties or use targeted advertising and targeting systems. Legal basis for processing - Article 6(1)(a) GDPR: the data subject's voluntary, explicit and informed consent.

You can withdraw your consent at any time, in which case your data will be deleted and will no longer be processed for this purpose. The withdrawal of consent does not affect the lawfulness of the processing based on consent prior to the withdrawal.

Scope of personal data processed

- Name, other identifier (identification data)
- E-mail address / mailing address / telephone number (contact details)
- Contact details based on the settings of the platform used
- Preferences

Source of personal data

- Contact
- Third parties
- Purchased databases

The retention period of the personal data

Until consent is withdrawn, but no later than five (5) years after the contractual relationship between us or the last contact.

Data processors

- IT service provider
- Storage service provider
- E-mail service provider
- In the case of advertising campaigns, the social media service provider displaying the ad

Recipient of data transfer

AutoWallis Nyrt.

Profiling or automatic decision-making

The processing of data reveals the interests and purchasing preferences of the data subjects, which are used to create a profile for targeted marketing activities, defining the categories of advertisements (e.g. by age group or by territory), without any other decision-making or legal consequences for the data subject.

2.3. Customer satisfaction surveys

Purpose and legal basis for data processing

As part of our quality assurance, we carry out surveys to find out what our customers think and how they experience the quality of our services and their satisfaction. Legal basis for processing - GDPR Article 6 (1) (f): legitimate interest of the Data Controller in quality assurance and improvement of its services.

You have the right to object to the processing of your personal data based on legitimate interests at any time.

Scope of personal data processed

- Name
- Identifier
- Fact and date of response
- Answers given

The retention period of the personal data

Until you object to the processing, but no later than 5 years after the contractual relationship between us or the last contact.

Data processor

- IT service provider
- Call centre service provider
- Storage service provider

Recipients of data transfers

AutoWallis Plc.

2.4. Sweepstakes, promotion

Purpose and legal basis for data processing

To promote our wigo carsharing service, we organise competitions and offer promotional offers. We use the data of the participants to document their participation in the games and promotions and to administer them in order to verify their eligibility and to send the prize to the recipients. The legal basis for processing is the Data Controller's legitimate interest in conducting the prize draw, promoting the service and verifying eligibility.

Article 6 (1) (f) GDPR.

You have the right to object to the processing of your personal data based on legitimate interests at any time.

Scope of personal data processed

- Name
- Fact and date of application,
- Sweepstakes, subject of promotion, value
- Fact and date of the prize

The retention period of the personal data

We will delete data related to competitions and promotions after five years after their closure. Exceptions to this rule are data related to financial accounting, which are stored for the period required by the Accounting Act (8 years).

Data processors

- Information technology service provider
- Server provider
- E-mail service provider

Recipients of data transfers

AutoWallis Nyrt.

2.5. Gift card purchase

Purpose and legal basis for data processing

When you purchase a gift card, we process the giver's data for the purpose of fulfilling the contract. If the recipient is also indicated on the gift card, we process the data for the purpose of preparing the contract between us. Legal basis for processing the performance of a contract between the Data Controller and the data subject. - Article 6(1)(b) GDPR.

Categories of the data processed

- Name (purchaser, recipient)
- E-mail address
- Address
- Phone number
- If you send a message with the gift card, we will also know the personal information in the message.
- Name, quantity, purchase price, method and date of payment for the goods or services purchased

Please be advised that the provision of personal data is a prerequisite for the conclusion of the contract. Without this information, we are unable to provide you with our gift card service.

The retention period of the personal data

The data will be kept for the period of time defined by the accounting and VAT law (8 years).

Data processors

- Information technology service provider
- Server provider
- E-mail service provider

- Gift card sales partner

2.6. Student discount

Purpose and legal basis for data processing

A student discount is available if you upload a proof of student status. Also, you can prove your eligibility through the platform offering student discounts. In the latter case, eligibility will be verified via this provider at set intervals (currently every six months). The data is processed for the purpose of verification of eligibility. Legal basis for processing - Article 6(1)(f) GDPR: the legitimate interest of the Data Controller in verifying the eligibility for the student discount.

You have the right to object to the processing of your personal data based on legitimate interests at any time.

Scope of personal data processed

- E-mail address
- Identifier generated by the student discount platform provider

The retention period of the personal data

The identifier generated by the company providing the student discount platform will be kept for five years after the end of eligibility.

Data processors

- Information technology service provider
- Student discount platform provider

2.7. Handling complaints

Purpose and legal basis for data processing

We maintain customer service to handle complaints about our services. We handle data when handling complaints. The legal basis for processing is to comply with a legal obligation. - Article 6(1)(c) GDPR.

Scope of personal data processed

- Name
- E-mail address
- Message and content of the reply
- Actions taken
- For messaging application, social media platform: community user ID
- In the case of a telephone call: recorded telephone call, fact of call and information given, telephone number
- In the case of a postal request: date and time of dispatch, content of the letter of complaint

The retention period of the personal data

In the case of a written complaint, five (5) years from the date of the complaint. Five (5) years from the date of the recording of the record in the case of a telephone record.

Data processors

- Information technology service provider
- Server provider
- E-mail service provider
- Website operator
- Social media providers

2.8. Transmission of data by users of the StreetCrowd service

We have a contract with NECTURE GmbH, the operator of the StreetCrowd service, to move our vehicles. Thus, if you use our service as a user of StreetCrowd through your NECTURE business account, we will carry out additional processing activities in relation to your personal data, in addition to the processing of data for general users.

An important difference and a change from our other data management activities is that the data transfers for the settlement are carried out as NECTURE's data processors.

StreetCrowd's privacy policy can be found here <https://www.streetcrowd.com/privacy-policy>.

Purpose and legal basis for data processing

We process personal data for the purpose of accounting for StreetCrowd users. Legal basis for processing - GDPR Article 6 (1) (b): performance of a contract between the Data Controller and the data subject.

Scope of personal data processed

- Driving data via NECTURE/StreetCrowd business user account
- E-mail address

The retention period of the personal data

The data will be processed for five (5) years until the termination of the contractual relationship or within the general limitation period, after which it will be deleted.

Data processors

- Information technology service provider
- Storage service provider
- E-mail service provider

2.9. wigo league loyalty program

Purpose and legal basis for data processing

In connection with the wigo league loyalty program, we process personal data of our customers who accept the terms and conditions of the loyalty program. The personal data is processed for the purpose of fulfilling the contract for the program. The legal basis for processing - Article 6(1)(b) GDPR. Our marketing activities under the Program are the same as those described in section 2.2.2 of this Privacy Notice - personalised advertising.

Scope of personal data processed

- Name
- E-mail address
- System ID
- Loyalty program achievements (wigo league points and levels) and associated discounts
- Date and fact of completion of the loyalty program challenges

The retention period of the personal data

The data will be kept for 5 years after the termination of the contract.

Data processors

- Server provider
- IT service provider
- Marketing agency

Recipients of data transfers

AutoWallis Nyrt.

3. Rights of data subjects

As a data subject, you have the right to request information about the processing of your personal data and access to such data. You also have the right to request the rectification, erasure or withdrawal of your personal data, except for mandatory processing. Furthermore, you may exercise your right to data portability by contacting us at the above contact details (**1.1. and 1.2.**). You may object to processing based on legitimate interest at any time.

Upon receipt of your request, we will provide you with the information you require without delay, but no later than one month after receipt of the request. This service is provided free of charge unless the request is deemed to be unfounded or excessive.

Right to be informed

We provide information about the details of data processing in a concise, transparent, understandable and easily accessible form, in clear and plain language. This document has been written for that purpose.

The right of access

You have the right to receive feedback from us on whether your personal data is being processed. If you provide us with appropriate proof of your identity and we process your personal data, you have the right to be informed of the details of the processing and to receive a copy of your personal data.

Right of rectification

Any data subject may request the rectification of personal data that we hold about him or her that is inaccurate for any reason, or the completion of incomplete data. We may ask for an additional information to ensure accuracy.

Right to erasure (right to be forgotten)

You are entitled to request the erasure of your personal data if one of the following grounds applies:

- the personal data are no longer necessary for the purposes for which they were collected;
- if you withdraw your consent and there is no other legal basis for the processing;
- if you object to the processing and there are no other legitimate grounds for the processing which override the objection;
- the unlawful processing of personal data has been established;
- we are under any other legal obligation to delete it.

Right to restriction of processing

You can request the restriction of the processing of your personal data in the cases set out in the GDPR. For example, for the time it takes to verify the disputed accuracy of personal data or if you request the retention

of data that would otherwise be deleted in order to pursue a legal claim.

If the processing is subject to restriction, the personal data will only be stored and processed beyond storage in exceptional cases. We will inform you in advance of the lifting of the restriction on processing.

Right to portability

As a data subject, you have the right to receive your personal data from us in a structured, commonly used, machine-readable format and to transfer this data to another data controller. Such a request will typically be in MS Word or Excel format. You have the right to data portability if the processing is automated and the legal basis for the processing is your consent or the performance of a contract.

Right to object

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data based on the legitimate interests of the Controller. As Data Controller, we may only continue to process your data where there are compelling legitimate grounds for doing so or where it is necessary to pursue legal claims.

Right to withdraw consent

In cases where we process your data on the basis of your consent, you have the right to withdraw your consent at any time, in which case we will cease processing. Withdrawal of consent does not affect the lawfulness of the processing that took place before consent was withdrawn.

4. Procedural rules, legal remedies

If you exercise your right as a data subject under the previous chapter, we will inform you of the action we have taken or, if not taken, of the reasons for not taking action without undue delay and in any event within one month of receipt of the request. If necessary and taking into account the complexity of the request and the number of requests, this time limit may be extended by two months. We will inform you of the extension, stating the reasons for the delay, within one month of receipt of the request.

If you submit your request to us in any form, we will respond by e-mail unless you specifically request otherwise.

We will inform all recipients to whom or with whom we have disclosed your personal data of any rectification, erasure or restriction of processing we have carried out, unless this is impossible or involves a disproportionate effort. We will inform you of these recipients upon request.

As a data controller, we handle, record, process and transmit the personal data of Data Subjects in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council, the General Data Protection Regulation ("GDPR"), Act CXII of 2011 on the Right to Information Self-Determination and Freedom of Information, and other legal provisions and recommendations of public authorities on data protection.

If you believe that your right to information self-determination has been violated, you have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information at.

National Authority for Data Protection and Freedom of Information
Postal address: 1530 Budapest, PO Box 5; website: <http://naih.hu>

In addition, if you believe that we are processing your personal data in breach of the legal requirements for the processing of personal data, you may also bring a lawsuit before the competent court in your place of residence or domicile (<https://birosag.hu/ugyfeleknek/birosagok/torvenyszekek>).