

## **Privacy Policy**

### **1. INTRODUCTION**

**URentBike Limited** needs to collect and use certain types of information about the Individuals or Service Users who meet **URentBike Limited** in order to carry on our work. This personal information must be collected and dealt with appropriately whether is collected on paper, stored in a computer database, or recorded on other material and there are safeguards to ensure this under the GDPR.

This Policy explains what types of information we process and why we do it; how we use such information and the possibility that we offer, including how to access and update information.

When this Privacy Policy mentions “URentBike Limited”, “we”, “us”, “our”, it refers to the URentBike Limited a legal entity registered under the laws of the Republic of Cyprus, that is responsible for users information within European Economic Area (EEA) under this Policy.

Words used in this Policy in the singular, where the context so permits, shall be deemed to include the plural and vice versa. Use of the feminine, masculine or neuter genders shall be deemed to include the genders not used.

This Privacy Policy applies to the access and use of URentBike Limited Application for Android ver. 6.0+, IOS - 9.0+ and URentBike Limited Websites hosted at urentbike.eu, collectively refer as “URentBike Limited” or “Services”.

This Privacy Policy sets out how URentBike Limited may collect, use, transfer, retain, secure and disclose your personal data as a Data Controller.

### **2. PERSONAL INFORMATION**

Personal Information is information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

We do not consider personal information to include information that has been anonymized or aggregated so that it can no longer be used to identify a specific natural person, whether in combination with other information or otherwise.

### **3. PUBLIC INFORMATION**

URentBike Limited is public and if users provide certain types of information, like photos, it are immediately viewable by anyone of URentBike Limited users. Information you have shared with others may continue to be publicly visible on URentBike Limited, even after your account is cancelled or consent is withdrawn. However, attribution of such information to you will be removed. Additionally, some copies of your information (e.g., log records) may remain in our database, but are disassociated from personal identifiers. If user updates public information placed by him on URentBike Limited, such as by deleting a review or photo, we will reflect your updated content on all URentBike Limited Services.

### **4. DATA COLLECTION**

We collect information to provide better services to all of our users (f.e. which language user speak).

We collect personal information from user and any gadget (including mobile devices) they use when they: use our Services, register for an account with us, provide us information on a web form, update or add information to their account.

We collect information in the following ways:

*I. Information users give us.*

- Account Information.

When you sign up for URentBike Limited Account, we require certain information, like name, email address, phone number, bank card details. Some kind of information, as an account's photo, users may provide in addition if they want to take full advantage of the sharing features we offer. When you communicate with us we collect information about your communication.

*II. Information we get from user's use of our services.*

We collect information about users' interaction with our Service. This information includes:

- Device information.

We collect device-specific information, such as user's unique device identifiers.

- Log information.

When user use our service or view content provided by us, we automatically collect and store certain information in server logs for a limited period of time, but any case not more than one week. This includes among others: details of how he or she used our service, device event information such as but not limited to hardware settings, language, cookies, IP address that may uniquely identify your browser or your Account. We use Log Information to operate our services and ensure the security of users account and robust performance of our Service, to protect processing data and provide to users technical support where it is necessary.

- Location information.

When users use our service, we (where the consent is obtained) may collect and process information about their actual location. We use various technologies to determine location, including, but not limited to IP address, GPS, and other sensors that may, for example, provide us with information on nearby devices, Wi-Fi access points and cell towers.

- Cookies and similar technologies.

We and our partners use various technologies to collect and store information when you use our service, and this may include using cookies or similar technologies to identify your browser or device.

A cookie is a small piece of data that is stored on your computer. Like many websites, we use cookies and similar technologies to collect additional website usage data and to operate our services. Cookies are not required for many parts of our services such as. Although most web browsers automatically accept cookies, many browsers' settings can be set to decline cookies or alert you when a website is attempting to place a cookie on your computer. However, some of our services may not function properly if you disable cookies. When your browser allows it, we use both session cookies and persistent cookies to better understand how you interact with our services, to monitor aggregate usage patterns, and to personalize and otherwise operate our services such as by providing account security, personalizing the content we show you including ads, and remembering your language preferences.

## **5. DATA STORAGE**

Information and records relating to service users' data will be stored securely and will only be accessible to authorized staff of URentBike Limited, unless otherwise specified herein

Personal Information, unless otherwise specified in this Policy will be stored for only 5 years, or as long as it is needed or required statute and will be disposed of appropriately.

## **6. DATA USAGE**

We use the information we collect from all of our services to provide, maintain, protect and improve them, to develop new ones, and to protect us and our users. We use information collected from cookies and other technologies, to improve user's experience and the overall quality of our services.

Depending on users account settings, his or her activity on apps may be associated with them personal information in order to improve our services. We will ask user for consent before using information where it is necessary and prescribed by law or for a purpose other than those that are set out in this Policy. We process personal information on URentBike Limited group of companies' servers.

## **7. LEGAL BASIS FOR PROCESSING**

We process any personal information about user using the lawful bases prescribed at the GDPR.

### **1. Consent.**

When collecting data based on consent, we will ensure that the User:

- Clearly understands why the information is needed
- Understands what it will be used for and what the consequences are should the User decide not to give consent to processing
- As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed
- Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- Has received sufficient information on why their data is needed and how it will be used
- Aware about the right to withdraw consent at any time

2. We process personal information based on user's consent at all appropriate cases provided by law. **Legitimate interest**

In certain cases we automatically collect information, including personal information, about the services you use and how you use them based on our legitimate interests. Particularly, we process such personal information as an online identifier, cookies, logs, location data and others.

This information is necessary for the adequate performance of Services, to enable us to comply with legal obligations and given our legitimate interest in being able to provide and improve the functionalities of our Services.

Legitimate interests means the interests of URentBike Limited in conducting and managing our business, to enable us to give you the best service/products and the best and most experience.

We use Legitimate Interest as the basis for the processing of Personal Information for the following purposes:

1. Marketing purpose. We want to make sure our marketing is relevant for you.
2. Protection against Fraud and other harmful activity. We want to make sure our Service is secure and protect users against fraud when transacting on our application and website. We may conduct security investigations and risk assessments and other actions in this connection.
3. Personalization. To operate, protect, improve, and optimize the Service and experience, and personalize and customize users' experience, we conduct profiling based among others on users' interactions with the Service, account information, and other content provided by users. We are not transfer such data to anyone outside of URentBike Limited group of companies and use such data only for achievement of aforementioned objective. We do not use for personalization data which can be treated as a sensitive personal information, such as connected with race, religion, sexual orientation.
4. Direct marketing purpose. We may process users' personal information for promotion of URentBike Limited company. Direct marketing involves the use of personal information to communicate directly with an individual to promote URentBike Limited. A direct marketer may communicate with an individual through a variety of channels, including telephone, email and online advertising.
5. Analytics. We may use user's personal information to assess the number of visitors, page views, clicks or other statistical data. For this, we may use different analytical services provided aggregate statistics based on users' cookies.
6. Transfer data within URentBike Limited group of company. We may transfer, store, and process user's information within our group of companies to facilitate our global operations. Where we transfer store, and process your personal information outside of the EEA we have ensured that appropriate safeguards are in place to ensure an adequate level of data protection. For instance, we rely on standard data protection clauses adopted by the Commission or a supervisory authority and approved by the Commission as a ground of data protection.
7. Service improvement. We process personal information given our legitimate interest in improving our Service and our users' experience with it. For this, we may send to users service or support messages, updates, security alerts, and account notifications or users may send us a feedback

When we process personal information for our legitimate interests, we make sure to consider and balance any potential impact on user (both positive and negative), and the user's rights

under data protection laws. We do not use user's personal Information for activities where our overridden by the impact on them (unless we have your consent or are otherwise required or permitted by law).

If users have any concerns about the processing that is based on our legitimate interests, users have the right to object the processing that is based on our legitimate interests.

### **3. Legal obligations**

Processing of users' personal information is necessary for compliance of our legal obligation.

### **4. Protection of data subject vital interests.**

We may keep basic data to identify the individual who exercised his right to erasure data for suppression purposes to prevent further unwanted processing such personal information.

## **8. TRANSPARENCY AND CHOICE**

People have different privacy concerns. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how it is used.

User should be gentle reminded that he or she may also set his or her browser to block all cookies, including cookies associated with our services, or to indicate when a cookie is being set by us.

However, it is important to remember that many of our services may not function properly if cookies are disabled. For instance, we may not remember even language preferences.

We process data in accordance with following Principles required that personal information:

- Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
- Shall not be processed in any manner incompatible with purpose for which consent on the processing was given,
- Shall be adequate, relevant and not excessive in relation to those purpose(s)
- Shall be accurate and, where necessary, kept up to date,
- Shall not be kept for longer than is necessary
- Shall be processed in accordance with the rights of data subjects under the GDPR,
- Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorized or unlawful processing or accidental loss or destruction of, or damage to, personal information,

We through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information
- Meet its legal obligations to specify the purposes for which information is used
- Collect and process appropriate information, and only to the extent that it is needed to fulfill its operational needs or to comply with any legal requirements
- Ensure the quality of information used
- Ensure that the rights of people about whom information is held, can be fully exercised under the GDPR.

- Take appropriate technical and organizational security measures to safeguard personal information
- Ensure that personal information is not transferred abroad without suitable safeguards
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information
- Set out clear procedures for responding to requests for information

## 9. USER'S RIGHTS

User may exercise any of the following rights:

1. The right to be informed.
2. Users have the right to be informed about the collection and use of their personal data. When we collect personal information we provide users with information including: purposes for processing their personal data, retention periods for that personal data, and who it will be shared with.
3. The right of access.
4. Users can make a subject access request to their personal data in writing. We respond on this request within 1 month.
5. The right to rectification.
6. If users' personal information processed by us is incomplete or inaccurate, they may request in writing to rectification or complement such data. We respond on this request within 1 month.
7. The right to erasure.
8. Users can make a request in writing to erase their personal data. We respond on this request within 1 month.
9. The right to withdrawn consent.
10. Users can withdraw their consent for processing personal information at any time. At this case, we stop processing user's personal information and we delete or anonymize such data. We respond on this request within 1 month.
11. The right to restrict processing.
12. Users have the right to request in writing the restriction or suppression of their personal data. When processing is restricted, we may store the personal data, but not use it. We respond on this request within 1 month.
13. The right to data portability.
14. Users have the right to request in writing to receive or transmitted to another controller personal data they have provided to us. This right can be exercised only by users, who have personal account as prescribed herein for personal information processing on the basis of their consent.
15. The right to object.

Users have the right to request in writing to object to the processing of their personal data in certain circumstances. If their request concerns processing of their personal data for the direct marketing or profiling purposes, we stop to do this. In other cases where the right to object applies, if we have a compelling reason for doing so, which we can show, we may be able to continue processing. We respond on this request within 1 month.

For any of the above requests, users firstly should sign up for URentBike Limited Account, specified a contact e-mail from which send a request to support@urentbike.eu Users should briefly explain the main concern of their request.

## **10. TRANSFER DATA TO THIRD PARTIES**

We do not share personal information with companies, organizations and individuals outside of our group of companies unless one of the following circumstances applies:

1. Users give his or her consent
2. We require opt-in consent for the sharing of any sensitive personal information, including location data
3. It is necessary to obtain analytical data about using of our Service.
4. We may transfer personal information, like cookies to Analytical Services, like Google Analytics, in order to assess the number of visitors, page views, clicks or other statistical data.
5. External processing.
6. We provide personal information to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy, GDPR and any other appropriate confidentiality and security measures.
7. For legal reasons.

We will share personal information with companies, organizations or individuals outside of our company if we have a good faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- To meet any applicable law, regulation, legal process or enforceable governmental request.
- To enforce Policy, including investigation of potential violations.
- To detect, prevent, or otherwise address fraud, security or technical issues.
- To protect against harm to the rights, property or safety of URentBike Limited, our users or the public as required or permitted by law.

We may share non-personally identifiable information publicly and with our partners – like publishers, advertisers or connected sites. For example, we may share information publicly to show trends about the general use of our services.

If we is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

## **11. CHILDREN'S PRIVACY**

Our services are restricted to users who are 18 years of age or older. We do not permit users under the age of 18 on our platform and we do not knowingly collect personal information from anyone under the age of 18.

## **12. CHANGES TO THIS PRIVACY POLICY**

We reserves the right to modify this Privacy Policy at any time in accordance with this provision. If we make changes to this Privacy Policy, we will post the revised Privacy Policy through the Service. We will also provide you with notice of the modification. If you disagree with the revised Privacy Policy, you may cancel your Account. If you do not cancel your Account before the date the revised Privacy Policy becomes effective, your continued access or use of the Service will constitute acceptance of the revised Privacy Policy.

### **13. CONTACT DETAILS**

If you have any questions or complaints about this Privacy Policy or URentBike Limited information handling practices, you may contact us at:

3026, Limassol, Cyprus, Vasili Michailidi , 9

Tel: +357 99 78852

**[support@urentbike.eu](mailto:support@urentbike.eu)**

This Privacy Policy is effective from June 1st, 2019.