



✉ [info@fobbr.co.uk](mailto:info@fobbr.co.uk) (mailto:info@fobbr.co.uk)



## Fobbr Ltd. PRIVACY POLICY

PLEASE READ THIS PRIVACY POLICY AND THE TERMS OF USE CAREFULLY BEFORE USING THE FOBBR WEBSITE, THE FOBBR APP, OR THE FOBBR SERVICE. IF YOU USE THE FOBBR WEBSITE, THE FOBBR APP, OR THE FOBBR SERVICE, IT MEANS YOU UNCONDITIONALLY ACCEPT THE TERMS OF THIS PRIVACY POLICY. IF YOU DO NOT ACCEPT THE TERMS OF THIS PRIVACY POLICY, DO NOT DO NOT DOWNLOAD, REGISTER WITH, OR USE THE FOBBR APP, DO NOT USE THE FOBBR WEBSITE AND DO NOT USE OUR SERVICE.

### 1. FOBBR PRIVACY POLICY

FOBBR (hereinafter referred to as “Fobbr”, “we”, “us” or “our”) operates a platform and community marketplace that helps Owners / Drivers connect, whether through our website or our mobile applications (“Platform”).

This Privacy Policy is intended to inform you about how we treat Personal Information that we process about you. If you do not agree to any part of this Privacy Policy, then we cannot provide the Platform or Services to you, and you should stop accessing the Platform and deactivate your Helbiz Account. To deactivate your Fobbr Account please submit a request to [info@fobbr.co.uk](mailto:info@fobbr.co.uk).

### 2. DEFINITIONS

Where the definition of a term does not appear in this Privacy Policy (such as "Listing", "Content," "Services", "Driver", "Owner" etc.), it shall be given its definition as outlined in our our Terms of Service.

"Affiliates" means a company related by common ownership or control. They can be financial and non-financial companies.

"Aggregated Information" means information about all of our users or specific groups or categories of users that we combine together so that it no longer identifies or references an individual user. "Data Controller" means Fobbr, the company responsible for the use and processing of Personal Information.

"Third Parties" means companies or persons not related by common ownership or control (i.e. nonaffiliates) or other unrelated individuals. Third Parties can be financial and non-financial companies, or persons other than you and Fobbr.

"Personal Information" means information (which may include sensitive information) relating to a living individual who is or can be identified either from that information or from that information in conjunction with other information that is in, or is likely to come into, the possession of the Data Controller.

### 3. WHAT TYPES OF INFORMATION DOES FOBBR GATHER ABOUT ITS USERS?

#### a. Information that you give us

We receive, store and process information, including Personal Information, that you make available to us when accessing or using our Platform and Services. Examples include when you:

- fill in any form on the Platform, such as when you register or update the details of your user account, or when you supply ID and other verification information;
- access or use the Platform, such as to search for or post Vehicles, make or accept bookings, pay for Rentals, book or pay for any associated services that may be available (such as but not limited to cleaning), post comments or reviews, or communicate with other users;
- communicate with FOBBR; and
- share information with another Member.

#### b. Information we get from your use of our Platform

We also receive, store and process information, possibly including Personal Information, when you access or use our Platform and Services, including but not limited to:

- Mobile Data

When you use certain features of the Platform, in particular our mobile applications we may receive, store and process different types of information about your location, including general information (e.g. IP address, zip code) and more specific information (e.g. GPS-based functionality on mobile devices used to access the Platform or specific features of the platform). If you access the Platform through a mobile device and you do not want your device to provide us with location-tracking information, you can disable the GPS or other location-tracking functions on your device, provided your device allows you to do this. See your device manufacturer's instructions for further details.

- Contact Information

You may use your contact information, such as your email address, phone number to create or customize your account or to enable certain account features, for example, for login verification. If you provide us with your email address, or phone number, you agree to receive emails to that email address, text messages to that phone number, as the case may be. We may use your contact information to send you information about our Platform and Services, to market to you, and to help prevent spam, fraud, or abuse.

- Log Data

We may also receive, store and process Log Data, which is information that is automatically recorded by our servers whenever you access or use the Platform, regardless of whether you are registered with Fobbr or logged in to your FOBBR Account, such as your IP Address, the date and time you access or use the Platform, the hardware and software you are using, referring and exit pages and URLs, the number of clicks, device event information, pages viewed and the order of those pages, and the amount of time spent on particular pages.

- Cookies and other Tracking Technologies

FOBBR uses cookies and other similar technologies, such as mobile application and other device identifiers, on the Platform. We may also allow our business partners to use their cookies and other tracking technologies on the Platform. As a result, when you access or use the Platform, you will provide or make available certain information to us and to our business partners. While you may disable the usage of cookies through your browser settings, we do not change our practices in response to a "Do Not Track" signal in the HTTP header from your browser or mobile application. We track your

activities if you click on advertisements for FOBBR services on Third-Party platforms such as search engines and social networks, and may use analytics to track what you do in response to those advertisements. We may, either directly or through Third Parties we engage to provide services to us, also continue to track your behavior on our own Platform for purposes of our own customer support, analytics, research, product development, fraud prevention, risk assessment, regulatory compliance, investigation, as well as to enable you to use and access the Platform and pay for your activities on the Platform. We may also, either directly or through Third- Parties we engage to provide services to us, track your behavior on our own Platform to market and advertise our services to you on the Platform and Third-Party websites. Third Parties that use cookies and other tracking technologies to deliver targeted advertisements on our Platform and/or ThirdParty websites may offer you a way to prevent such targeted advertisements by opting-out at the websites of industry groups such as the Network Advertising Initiative and/or the Digital Advertising Alliance. You may also be able to control advertising cookies provided by publishers, for example Google's Ad Preference Manager. Please note that even if you choose to opt-out of receiving targeted advertising, you may still receive advertising on or about the Platform – it just will not be tailored to your interests. In addition, if you disable cookies, you may lose some of the features and functionality of using our Platform, Application and Services, as cookies are necessary to track and enhance your use and access. Third Parties may not collect information about users' online activities on the Platform except as described in this policy and our Cookie Policy.

- Third-Party social plugins

Our Platform may use social plugins which are provided and operated by Third-Parties, such as Facebook's Like Button. As a result of this, you may send to the Third-Party the information that you are viewing on a certain part of our Platform. If you are not logged into your account with the Third-Party, then the Third Party may not know your identity. If you are logged into your account with the Third Party, then the Third Party may be able to link information about your visit to our Platform to your account with them. Similarly, your interactions with the social plugin may be recorded by the Third Party. Please refer to the Third Party's privacy policy to find out more about its data practices, such as what data is collected about you and how the Third Party uses such data.

#### 4. HOW FOBBR USES AND PROCESSES THE INFORMATION THAT YOU PROVIDE OR MAKE AVAILABLE

a. We use, store and process information about you for the following general purposes:

- to enable you to access and use the Platform;
- to enable you to communicate with other Members, including but not limited to by sending
- to operate, protect, improve and optimize the Platform, FOBBR business, and our users' experience, such as to perform analytics, conduct research, personalize or otherwise customize your experience, and to provide customer service;
- to help create and maintain a trusted and safer environment on the Platform and Services, such as detection and prevention of actual and potential fraud and other harmful activity, conducting investigations and risk assessments, enforcing our Terms and policies, verifying the address of your listings, verifying any identifications provided by you (including by comparing the photo on that identification to another photo you provide to us), and conducting checks against databases and information sources (such as but not limited to public government databases) for fraud detection and prevention, risk assessment and harm prevention purposes. In this regard, we may do any or all of the foregoing with or without further notifying you;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- to send you marketing, advertising, and promotional messages and other information that may be of interest to you, including information about Helbiz, our services, or general promotions for partner campaigns and services. You can unsubscribe or opt-out from receiving these communications in your settings (in the "Account" section) when you login to your Helbiz Account;
- to administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by FOBBR or our Third Party business partners; and
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with Third Parties.

#### b. How FOBBR Uses and Processes User Communications

We may, either directly or through Third-Parties we engage to provide services to us, review, scan, or analyze your communications with other users exchanged via the Platform for fraud prevention, risk assessment, regulatory compliance, investigation, product development, research and customer support purposes. For example, as part of our fraud prevention efforts, the Platform may scan and analyze messages and attachments to mask contact information and references to other websites. This helps to prevent fraudulent actors from asking Drivers to send them money outside of

the Platform, such as by bank transfer or other money transfer methods. We may also scan, review or analyze messages for research and product development purposes to help make search, booking and user communications more efficient and effective, as well as to debug, improve and expand product offerings. We will not review, scan, or analyze your communications for sending Third-Party marketing messages to you. We will also not sell these reviews or analyses of communications to Third Parties. We will also use automated methods to carry out these reviews or analyses where reasonably possible. However, from time to time we may have to manually review some communications. By using the Platform, you consent that FOBBR, in its sole discretion, may, either directly or through Third-Parties we engage to provide services to us, review, scan, analyze, and store your communications, whether done manually or through automated means.

## 5. SHARING OF INFORMATION

### a. DISCLOSURE OF PERSONAL INFORMATION

We do not sell, trade, or otherwise transfer to third parties your personally identifiable information. This does not include trusted third parties who assist us in operating this Service, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We will disclose your Personal Information and Usage Information, or other information collected about you, to vendors for purposes such as the provision, operation, maintenance, administration, promotion, improvement, and oversight of the Service, and advertising services, or to fulfill your requests for information or the Service.

We may disclose your Personal Information and Usage Information, or other information collected about you to insurance companies involving your use of a vehicle or the Service, as necessary to respond to and resolve claims made by a vehicle owner, you or by a third party. We may disclose your Personal Information and Usage Information, or other information collected about you, to law enforcement, regulatory bodies, and/or vendors we use to process your traffic violations or tickets, or to aide in the investigation and resolution of an accident involving your use of the vehicles.

We may share Personal Information and Usage Information with our parent company and affiliates. We may also release Personal Information and Usage Information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, safety or property. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

## b. DISCLOSURES OF PERSONAL INFORMATION IN LEGAL PROCEEDINGS

If FOBBR or any of our service providers is requested by law enforcement officials or judicial authorities to provide Personal Information on individual users, FOBBR or the applicable service provider may, without your consent, provide such requested information. In matters involving claims of personal or public safety, FOBBR or the applicable service provider may provide your Personal Information to appropriate authorities without your consent or court process. FOBBR or our service providers also will provide your Personal Information in response to a search warrant or other legally valid inquiry or order, or to an investigative body in the case of a breach of an agreement or contravention of law, or in litigation involving FOBBR, the applicable service provider, or otherwise as required by law. We may also disclose Personal Information to assist in debt collection where you owe a debt to us.

## 6. COOKIES AND OTHER TECHNOLOGIES

The technologies we use for automatic information collection may include cookies or mobile cookies, web beacons

### a. COOKIES

A cookie is a tiny element of data that we may place on your computer, smartphone or other device so we can recognize you when you return. All pages on the Service where you are prompted to log in or that are customizable require that you accept cookies. There are two main types of cookies:

- i. **Session Cookies:** these are temporary cookies that expire at the end of a browser session; when you leave the site. Session cookies allow a website to recognize you as you navigate between pages during a single browser session and allow you to use the website most efficiently. For example, session cookies enable a website to remember that a user has placed items in an online shopping basket.
- ii. **Persistent Cookies:** in contrast to session cookies, persistent cookies are stored on your equipment between browsing sessions until expiration or deletion. They therefore enable a website to "recognize" you on your return, remember your preferences, and tailor services to you.

In addition to session cookies and persistent cookies, there may be other cookies, which are set by our Website or Mobile App, in order to provide us, or third parties, with information. If you have registered with the Service, these cookies (1) may let us know who you are, (2) are necessary to access your account information (stored on our computers) in order to deliver

products and personalized services, and (3) will provide us and our service providers with information that we will use to personalize the Service in accordance with your preferences. [Cookies are also required to optimize your shopping experience in that they allow you to add multiple items to your shopping basket before checking out]. You may set your web browser to notify you when you receive a cookie. However, should you decide not to accept cookies from this Service, you will limit the functionality we can provide when you visit the Service.

We may also use cookies to improve the performance of our advertising on other websites.

#### b. OTHER TRACKING TECHNOLOGIES

We also use "pixel tags" (also known as "web beacons" or "tracking pixels"), which are tiny graphic images, on our websites and in our emails. Pixel tags help us analyze our customers' online behavior and measure the effectiveness of our websites and our advertising. We work with service providers that help us track, collect, and analyze this information.

#### c. USE OF GOOGLE ANALYTICS

We use "Google Analytics" to help us anonymously track and report visitor behavior information and visitors' standard log information to the Service. This information (including but not limited to: IP address, data storage, maintenance services, database management, web analytics and information processing) helps us analyze and evaluate how the Service is used as part of our ongoing efforts to improve the Service. No personally identifying data is included in this type of reporting. Google Analytics may have access to your information only for the purposes of performing these tasks and on our behalf and under obligation similar in those in this Privacy Policy. Google's ability to use and share information collected by Google Analytics about your visits to this Service is restricted by the Google Analytics Terms of Use (<http://www.google.com/analytics/terms/us.html>) and the Google Privacy Policy (<http://www.google.com/policies/privacy/>). You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser or by opting out of Google Analytics Cookies (<https://tools.google.com/dlpage/gaoptout?hl=en>).

#### d. ADVERTISING/BEHAVIORAL TARGETING

We may use third party ad network providers to help present ads on the Service, as well as other service providers to evaluate and provide us with information about the use of the platforms and viewing of our content. Such providers may place and access cookies, pixel tags, or similar technologies on your device to serve you ads or other content personalized to your



interests, which they infer from your browsing on the Service and other sites you have visited. In doing so, the provider collects or has access to non-Personal Information such as your Usage Information. The use of cookies, pixel tags, or similar technologies by these providers is subject to their own privacy policies, not ours.

## 7. INFORMATION WE RECEIVE FROM THIRD PARTIES

We may receive information about you from third parties. For example, if you are on another website and you opt-in to receive information from our Service, that website will submit to us your email address and other Personal Information about you so that we may contact you as requested. You may also choose to participate in a third-party application or feature (such as one of our Facebook or Twitter applications or a similar application or feature on a third-party website) through which you allow us to collect (or the third party to share) information about you, including usage information, device identifiers, and Personal Information such as lists of your friends, "likes", comments you have shared, groups and location. Services like Facebook Connect might give you the option to post information about your activities on our Service to your profile page to share with others within your social networks. In addition, we may receive information about you if other users of a thirdparty website give us access to their profiles and you are one of their "connections" or information about you is otherwise accessible through your "connections" web page, profile page, or similar page on a social networking or other third party website or interactive service. We may also receive information about you from third party data providers. We may supplement the information we collect about you through the Service with such information from third parties in order to enhance our ability to serve you, to tailor our content to you and/or to offer you opportunities to purchase products or services that we believe may be of interest to you.

## 8. INFORMATION WE RECEIVE FROM THIRD PARTIES


We may receive information about you from third parties. For example, if you are on another website and you opt-in to receive information from our Service, that website will submit to us your email address and other Personal Information about you so that we may contact you as requested. You may also choose to participate in a third-party application or feature (such as one of our Facebook or Twitter applications or a similar application or feature on a third-party website) through which you allow us to collect (or the third party to share) information about you, including usage information, device identifiers, and Personal Information such as lists of your friends, "likes", comments you have shared, groups and location. Services like Facebook Connect might give you the option to post information about your activities on our Service to your profile page to share with others within your social networks. In addition, we may receive information about you if other users of a thirdparty website give us access to their profiles and you are


one of their "connections" or information about you is otherwise accessible through your "connections" web page, profile page, or similar page on a social networking or other third party website or interactive service. We may also receive information about you from third party data providers. We may supplement the information we collect about you through the Service with such information from third parties in order to enhance our ability to serve you, to tailor our content to you and/or to offer you opportunities to purchase products or services that we believe may be of interest to you.

- Advertisers, ad networks, and ad servers
- Analytics companies
- Your mobile device manufacturer.
- Your mobile service provider.

These third parties may use tracking technologies to collect information about you when you use this app. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites, apps, and other online services websites. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

## Contact Info

 [info@fobbr.co.uk](mailto:info@fobbr.co.uk) (mailto:info@fobbr.co.uk)

 [Privacy Policy](#) (privacypolicy.php)

©2018 The Fobbr Corporation. All Rights Reserved.