

## Privacy Policy

We are committed to providing you notice about how Eride Club Inc. and our affiliate and subsidiary companies (together, “**Eride Club**” or “**we**”, or “**us**”, or “**our**”) handle your information. This Eride Club Privacy Policy (the “**Privacy Policy**”) applies to the information, that we collect and process about users of our Services, and those who communicate with us about our Services, interact with us on social media, attend our events, participate in our surveys, contests and promotions, or are subscribed to our marketing and informational communications (the “**Interactions**”). In this Privacy Policy, “**Services**” means:

- Eride Club websites that link to this Privacy Policy, including any versions optimized for viewing on a mobile device (the “**Sites**”),
- Eride Club mobile applications (each an “**App**”),
- Eride Club vehicles (each a “**Vehicle**”), and
- the features and services available through our Sites, Apps and Vehicles

We have established this Privacy Policy to let you know the kinds of information we may gather during your use of the Services and related other Interactions, how we use your information, when we might disclose your information, and your rights and choices regarding your information that we collect and process.

Eride Club provides our Services to users throughout the world. Eride Club Inc. 2621 Artesia blvd, Redondo Beach, CA 90278, USA is the responsible entity (or data controller) for your information.

This Privacy Policy contains the following sections:

- The Information We Collect
- Use and Processing of Information and EU Legal Bases
- Disclosure of Your Information
- Use of Cookies and Other Online Tracking Technologies
- Online Advertising
- How We Protect Your Information
- Retention of Your Information
- International Users
- Third Party Links and Services
- Changes to this Privacy Policy
- Your Choices
- Access and Data Subject Rights
- Your California Privacy Rights
- Contact Information

### THE INFORMATION WE COLLECT

We collect information related to our Services and Interactions directly from users, automatically related to their use of the Services and our Interactions, as well as from third parties. We may combine the information we collect from these various sources.

**Information You Provide to Us.** We collect information directly from users:

- Account registration, management, profile creation and modification
- Account access and use, as well as uploading content to the Services and other associated activities
- Vehicle use
- Access to and use of the Sites and Apps
- Submission of payment information
- Event registration and attendance
- Participation in surveys, contests, sweepstakes and promotions sponsored by Eride Club
- Signing up to receive alerts or other information via email, text or instant messages from Eride Club
- Customer service, technical support, and related communications
- Participation in communities, commenting on blog entries, interacting with use on social media, and participation in other forums
- Submission of an application or resume to work at Eride Club

The types of information we collect directly from you are: your name, e-mail address, phone number, postal address, other contact information, credit card and billing details, including billing address, communications preferences, payment and transaction history, where required your birthdate and driver's license information or other identification card, and any other information you submit to the Services or otherwise provide to us. We also collect certain demographic data if you provide it to us including age, gender, preferred language, and current location.

**Automatically Collected Information.** We also collect information through automated and technical means as you browse our Sites, use our Apps, or otherwise use the Services:

- **Device and Online Usage.** We collect information about your computer, browser, mobile or other device that you use to access the Services. We may use cookies, pixels, log files and other similar technologies to collect such information, including IP address, device identifiers and other unique identifiers, browser type, browser language, operating system name, and version, device name and model, version, referring and exit pages, dates and times you access our Services, the length of time that you are logged into or using our Services, the links you click or features you use, software crash reports and session identification number. Please see the "Use of Cookies and Other Online Tracking Technologies" section below or our [Cookie Notice](#) for more information.
- **Location Info and Vehicle Usage.** We automatically collect and store location information from your device and from any Vehicles you use. We collect and store the location information (e.g., city, state or zip code where available) associated with the IP address of the device you use to access the Services, as well as, with your permission,

your mobile device's location information using GPS or Bluetooth (you can change your location/Bluetooth settings for your mobile device; however, certain features may not be available through the App if you do so).

- **Analytics:** We compile and analyze information derived from the use of our Services, such as aggregate usage patterns, user preferences, peak demand times, common routes and other information.

**Information We Collect From Third Party Sources.** In some cases, we collect user information from third parties.

- **Third Party Platforms and Social Media Sites.** When you interact with us or post content about us on third-party social media platforms – like Facebook, Twitter, Google+, Tumblr, LinkedIn, YouTube or Pinterest – we may collect certain information about that interaction; the information that we may collect is based on your settings on and the policies of these social media platforms. We may also allow you to post certain information from these platforms to your Eride Club profile, and permit you to login to the Services using your third-party social media account, in which case you will be asked to consent to our access and collection of certain information from your social media profile, subject to the policies of that platform.
- **Other Third-Party Sources.** We also may collect information about you that we may receive from business partners, marketers, analysts and other sources to, enable us to verify and update information contained in our records and better customize the Services for you. We may also collect information from credit reporting agencies to determine your creditworthiness, credit score and credit usage, in compliance with and to the extent permitted by applicable laws.
- **Referrals.** We may from time to time conduct a referral service so that you may introduce people you know to our Services, in accordance with applicable local laws. If you choose to use our referral service to tell someone about our Services, we will provide you with a template message and referral code to send to your friend. We will not collect the referral's information unless he/she signs up to use the Services with the referral code.

## **USE AND PROCESSING OF INFORMATION AND EU LEGAL BASES**

We generally use the information we collect from and about you to provide and operate the Services, respond to user requests, for customer service and support, to protect our rights and those of others, to send marketing communications, to help us personalize user experiences and to improve the Services, as explained in more detail below.

**Legal Bases for Processing Under EU Law.** Where EU data protection law applies, we process your personal data as defined by applicable EU law for the purposes set out in the table below, under the following legal bases:

- ***Our Contract With You.*** Our processing is necessary to perform our obligations under a contract with you or to perform steps requested by you prior to entering into a contract with you (e.g., to verify the information you have provided to us and provide the Services to you).
- ***Our Legitimate Interests.*** Our processing is necessary for our legitimate interests, including to protect the security our Services; to protect the health and safety of others; to establish, protect and defend our legal rights and interests; to monitor and protect our Vehicles; to prevent fraud and verify identity and authorization of users; to personalize user experiences and content; to understand and analyze usage trends; and to improve the Services.
- ***Legal Compliance.*** Where our processing is required to comply with applicable law (for example, to maintain your payment transaction history for tax reporting purposes).
- ***Your Consent.*** When we have your consent as defined by applicable law.

In addition, we may process information to the extent necessary to protect the health, safety or vital interests of any person and to establish, protect and defend our legal rights.

**Purpose of Use and Processing.** Generally, we use the information we collect as set forth in the below table:

Purposes of Use and Processing of Information	EU Legal Bases
<b><i>Providing Support and Services</i></b>	
To provide and operate the Services and related features, fulfill your orders and requests and to process your payments	<i>Our Contract with You</i>
To update the Services	<i>Our Legitimate Interests</i>
To track Vehicles, including location, battery levels and rental status	<i>Protect Legal Rights</i>
To permit you to update, edit, and manage your content	
To communicate with you about your use of the Services and respond to your inquiries and complaints	
For troubleshooting, technical and customer service and support purposes	
<b><i>Verification</i></b>	<i>Our Contract with You</i>
To verify the identity of users, applicants and others with whom we interact	<i>Our Legitimate Interests</i>
To confirm authorization of users that access and use the Services	
<b><i>Improve Services and Analytics</i></b>	
To create anonymous or aggregate information	
To optimize or improve our products, services and operations	<i>Our Legitimate Interests</i>
To perform statistical, demographic, and marketing analyses of our users, to analyze and understand usage and activity trends, demographic trends and for other research, analytical, and statistical purposes	
<b><i>Communicate with You</i></b>	<i>Our Contract with You</i>
To communicate with you about your account or transactions with us (including Services-related announcements) or your comments to a blog post	<i>Our Legitimate Interests</i>
To communicate with you about changes to our policies	

## Purposes of Use and Processing of Information

### EU Legal Bases

*Protect Legal Rights*

#### ***Personalize Services and Ads***

To personalize content and experiences on our Services, including providing you reports, recommendations, and feedback based on your preferences, and to use your location information for personalization purposes

*Our Legitimate Interests  
Your Consent*

To better target ads so that users receive ads that are relevant to them

#### ***Marketing and Promotions***

To send you information, news, updates and offers about us or our Services (subject to your consent where required by applicable law)

*Our Legitimate Interests  
Your Consent*

For other direct marketing and promotional purposes

#### ***Protect Legal Rights and Prevent Misuse***

To protect the Services and our business operations

*Our Legitimate Interests*

To detect, investigate, prevent or take action regarding illegal activities, misuse, suspected fraud or situations involving potential threats to the safety or legal rights of any person or entity, and as evidence in litigation

*Our Contract With You*

To investigate, enforce and prevent violations of our policies and terms (including this Privacy Policy, our Terms of Use and Rental Agreement)

*Protect Legal Rights*

As otherwise necessary to establish, protect and defend our legal rights

#### ***Complying with Legal Obligations***

*Legal*

To comply with the law

*Compliance*

To respond to legal process or enforcement or legal process requests, e.g. in response to subpoenas, court orders and other lawful requests by regulators, courts and law enforcement agencies, or related to national security requests

*Our Legitimate Interests  
Protect Legal Rights*

#### ***General Business Operations***

Where necessary for the administration of our general business, accounting, recordkeeping and legal functions

*Our Legitimate Interests*

As part of our routine business administration, such as employee training, compliance auditing and similar internal activities

*Protect Legal Rights*

## DISCLOSURE OF YOUR INFORMATION

We disclose the information we collect, in the following ways:

- **Affiliates and Subsidiaries.** Amongst our affiliated and subsidiary companies in furtherance of the purposes set out in this Policy; their use of your information is subject to this Privacy Policy.
- **Business Partners and Third Parties.** We may share your information with business partners who jointly sponsor events with us, from time to time; where required by applicable law, we will obtain your prior consent. You may at any time withdraw your

consent or tell us to stop sharing your personal information (as defined under applicable law) with business partners and third parties by following the opt-out process described in the “Your Choices” section below. If you use the Services through a third-party platform that manages its own fleet of Eride Club vehicles, we will also share your information with the platform operator to assist in operating the Services.

- **Third-Party Service Providers.** We use a variety of third party service providers that perform functions on our behalf, such as hosting, billing and payment processing, push notifications, storage, bandwidth, content management tools, analytics, customer service, fraud protection, etc.
- **General Business Operations.** Where necessary to the administration of our general business, accounting, record keeping and legal functions, to our tax advisors, legal counsel and other professional services entities or agents.
- **Legal Compliance and Protection of Rights.** We may also use or disclose information if required to do so by law or in the good-faith belief that such action is necessary to (a) conform to applicable law or comply with legal process served on us or the Services; (b) establish, protect and defend our rights or property, the Services or our users, including to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use, Rental Agreement, other agreements or policies, or as evidence in litigation in which we are involved; and (c) act under emergency circumstances to protect the personal safety of us, our affiliates, agents, or users of the Services or the public. This includes exchanging information with other companies and organizations for fraud protection.
- **Other Users.** Certain features of our Services make it possible for you to share comments publicly with other users. Any information that you submit through such features is not confidential and may be accessed by others. For example, if you submit a product review on one of our Sites, we may display your review (along with the name provided, if any) on other Eride Club Sites and on third-party websites. Moreover, if you provide a comment on our blog, other blog readers will be able to review your comments, and if you interact with us on our social media pages, your comments will be publicly available. So, please take care when using these features. If you’d like to request removal of information that we have posted about you, please contact us as set forth in the “Your Choices” section below.
- **Aggregate/Anonymous Information.** We may share aggregate/anonymous information about use of the Services with third parties for research, marketing, analytics and other purposes, provided such information does not identify a particular individual, such as by publishing a report on usage trends. The sharing of such data is unrestricted.
- **Business Transfers.** As we continue to develop our business, we may seek to buy, merge, or partner with other companies. In such transactions, (including in contemplation of such transactions) user information may be among the transferred assets. If a portion or all of our assets are sold or transferred to a third party, customer information would likely be one of the transferred business assets. If such transfer is subject to additional mandatory restrictions under applicable laws, we will comply with such restrictions.

To request more information about the companies to whom we have disclosed your information, please contact us as set out in the “Contact Information” section.

## USE OF COOKIES AND OTHER ONLINE TRACKING TECHNOLOGIES

Like most Sites and Apps and online Services, we use “cookies,” web beacons (a/k/a pixel tags), analytics devices and similar technologies (some of which are operated by third parties) to record your preferences, gather information about the use of our Services, personalize content and ads and track information about the performance of our advertisements. We may also use these technologies to monitor traffic and make the Services easier and/or more relevant for your use. We may combine this information with other information we collect from you.

**Cookies.** These are alphanumeric identifiers that we transfer to your device’s hard drive through your web browser for record-keeping purposes and associate with small text files that we use to record certain information regarding your use of our online Services, your preferences and actions, and other device and usage data as described above. Some cookies allow us to make it easier for you to navigate our Sites, Apps, and Services, while others are used to enable a faster log-in process, personalize your use of the Services, or otherwise allow us to track your activities while using our Services. Many web browsers automatically accept cookies, but you can usually modify your browser’s setting to decline or block cookies if you prefer. If you delete your cookies or if you set your browser or device to decline or block these technologies, some features of the Services may not work or may not work as designed.

**Pixel tags (a/k/a web beacons or clear GIFs).** Pixel tags are tiny graphics with a unique identifier, similar in function to cookies, which are embedded invisibly on web pages or within emails. We or our service providers may use pixel tags in connection with our Services to, among other things, track the activities of users of the Site and App, help manage content, measure ad performance and compile statistics about usage. We or our service providers also use pixel tags in HTML emails to our customers to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

**Analytics Services.** We use third-party analytics services, including Google Analytics, a web analytics service provided by Google, Inc. (“Google”), on our Services. Google Analytics uses cookies and other tracking technologies to help us analyze how users interact with and use the Services, compile reports on user’s’ activity, and provide other services related to activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a return visitor, and any referring website or app. To learn more about Google’s analytics services and to learn how to opt out of tracking of analytics by Google click [here](#). We also use MixPanel to collect information about site usage. For more information and to opt out of MixPanel tracking technologies, please click [here](#).

For more information about our use of cookies, third-party analytics and other tracking devices, please see our [Cookie Notice](#).

## ONLINE ADVERTISING

In order to display more relevant advertising on our Services, to manage our advertising on third-party sites, mobile apps and online services, and to measure and improve our ads and marketing efforts, we may work with Facebook, Google and other third-party ad companies, ad exchanges,

channel partners, measurement services and ad networks. Please see the “Use of Cookies and Other Online Tracking Technologies” section below or our [Cookie Notice](#) for more information.

These third parties may use cookies, web beacons or other tracking technologies to collect information about your use of the Services and your activities across other websites and online services, which they may associate with persistent identifiers. This information may be used to provide you with more relevant advertising or other targeted content on our Services and other websites or services, and to measure the performance of such advertising. Their activities and your choices regarding their use of your information to personalize ads to you are subject to and set out in their own policies.

**More Information.** For more information and to exercise your choices regarding Facebook and Google ads:

- **Facebook** (more info: [privacy policy](#); choices: ad preferences page), and
- **Google/DoubleClick** (more info: [privacy policy](#); choices: [ads help](#) page)

You can also learn more about online advertising at [www.aboutads.info/consumers](http://www.aboutads.info/consumers) and opt out of interest-based advertising from many participating ad companies at the ad industry websites below:

- **Canada:** [www.youradchoices.ca](http://www.youradchoices.ca)
- **EU:** [www.youronlinechoices.eu](http://www.youronlinechoices.eu)
- **U.S.:** [www.aboutads.info](http://www.aboutads.info)

Similarly, you can learn about your options to opt-out of mobile app tracking by certain advertising networks through your device settings. For more information about how to change these settings for Apple, Android or Windows devices, see:

- **Apple:** <http://support.apple.com/kb/HT4228>
- **Android:** <http://www.google.com/policies/technologies/ads/>
- **Windows:** <http://choice.microsoft.com/en-US/opt-out>

Please note that opting-out of advertising network services does not mean that you will not receive advertising while using our Services or other services, nor will it prevent the receipt of interest-based advertising from third parties that do not participate in these programs.

**Do-Not-Track.** Your browser or device may include “Do-Not-Track” settings or functionality. Currently, our systems do not recognize browser “Do-Not-Track” requests. Eride Club’s information collection and disclosure practices, and the choices that we provide to customers, will continue to operate as described in this Privacy Policy, whether or not a Do-Not-Track signal is received. However, you may disable certain tracking on our Sites, as discussed in this section (e.g. by disabling cookies), and you may opt-out of certain third party ad networks as described below. For more information about Do-Not-Track signals, please click [here](#).

## HOW WE PROTECT YOUR INFORMATION

We take technical, physical and organizational security measures to protect your information against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access. However, no method of transmission over the Internet, and no means of electronic or physical storage, is absolutely secure. We encourage you to take steps to protect your information and prevent unauthorized access to your password or account by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords, or for any activity on your account via unauthorized password activity.

## **RETENTION OF YOUR INFORMATION**

We retain your information for as long as required to satisfy the purpose for which it is collected and used (for example, for the time necessary for us to provide you with customer service, answer queries or resolve technical problems), unless a longer period is necessary for our legal obligations or to establish, protect, or defend legal claims.

## **INTERNATIONAL USERS**

Eride Club is a global company with affiliates, service providers and partners in multiple jurisdictions. As such, your information may be transferred, accessed, stored and otherwise processed by us and these third parties for the purposes described above, and subject to requests from law enforcement, in jurisdictions outside of your home jurisdiction, including the United States, Mexico and the European Economic Area and other jurisdictions in which we or our service providers operate. Some of these jurisdictions, including the United States, may not provide an equivalent level of data protection as your home jurisdiction. By providing us with your information, you acknowledge any such transfer, storage, or use. We will take steps to ensure that your information receives an adequate level of protection in the jurisdictions in which we process it, including through appropriate written data processing terms and/or data transfer agreements.

***Individuals in the EEA.*** If you are located in the European Economic Area, where your information is processed by members of our group or third-party service providers and processors in a jurisdiction that the European Commission has deemed to not provide an adequate level of data protection (a “third country”), we will take appropriate measures to ensure your information is subject to adequate safeguards, such as by signing relevant EU standard contractual clauses approved by the European Commission (the form for these clauses can be found [here](#)) or another measure that has been approved by the European Commission as adding adequate safeguards for the protection of information when transferred to a third country. If you are in the EEA, you have the right to obtain details about the mechanism under which your information is transferred to a third country. For more information about these transfer mechanisms, please contact us as set out in the “Contact Information” section below.

## **THIRD PARTY LINKS AND SERVICES**

The Services contain links to third-party websites such as social media sites, and also contain third-party plug-ins and functionalities (such as the Facebook “like” button and Twitter “follow” button). If you choose to use these sites or features, you may disclose your information not just to those third parties, but also to their users and the public more generally depending on how their services function. We are not responsible for the content or practices of those websites or services. The collection, use, and disclosure of your information will be subject to the privacy policies of the third-party websites or services, and not this Privacy Policy. We urge you to read the privacy and security policies of these third parties.

## **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to amend this Privacy Policy at any time to reflect changes in the law, our data collection and use practices, the features of our Services, or advances in technology. We will make the revised Privacy Policy accessible through the Services and updating the “Effective Date” for the Privacy Policy. If we make a material change to the Privacy Policy, you will be provided with appropriate notice in accordance with legal requirements. By continuing to use the Services, you are confirming that you have read and understood the latest version of this Privacy Policy.

## **YOUR CHOICES**

If you would like to update your preferences on the types of communications you receive from us, or opt out of marketing communications from us, you may do so at any time by updating the communication preferences in your account profile. Please note that we may continue to send non-promotional communications such as important notices, payment confirmations and transaction-related emails and other information about your use of the Services. If you would like to opt-out of (i) marketing communications, or (ii) being included in any Custom Audience campaigns (*see* the “Online Advertising” section above for more information), you may also do so by emailing us your request at [info@erideclub.com](mailto:info@erideclub.com).

## **ACCESS AND DATA SUBJECT RIGHTS**

Subject to applicable law and as explained in this section, you may have certain rights with respect to the information we collect and process about you.

**Access, Correction, Deletion and Objection Rights.** You may have the right to access, request correction and deletion of, and object to our use of your information. To exercise your rights, please contact us as set forth in the “Contact Information” section below. You may also access and modify much of the information that you have submitted by logging into your account and updating your profile. Please note that copies of information that you have updated, modified, or deleted may remain viewable in cached and archived pages of the Sites or Apps for a period of time. In addition, we may retain certain information about you as required by law or as permitted by law for legitimate business purposes. For example, if you request that we delete your

information but we believe that you have violated our Terms of Use, we may retain information about you in order to attempt to resolve the issue before deleting it.

**Complaints.** If applicable, you may make a complaint to the privacy regulator or supervisory authority in the country where you are based. Alternatively you may seek a remedy through local courts if you believe your rights have been breached.

**EU Data Subject Rights.** Subject to applicable laws, you may have the following rights:

- To obtain access to and/or a copy of certain information we hold about you
- To obtain, in certain circumstances, a copy of certain information we of yours in a structured, commonly used and machine readable format, and to ask us to transfer this to a third party of your choice
- To request that we update your information we hold that is out of date or incorrect
- To request that we delete certain information we hold about you
- To request that we restrict the way we process and disclose certain of your information
- To revoke your consent for the processing of your information, to the extent our processing of your information is not based on another legal basis
- To object to certain processing of your information as follows:
  - right to object to direct marketing: you may object to our processing of your information for direct-marketing purposes (including any direct marketing processing based on profiling). *See* “Your Choices” above for more info.
  - right to object to processing (including profiling) based on legitimate interest grounds: in addition where we are relying upon our legitimate interests to process information, you may object to that processing. If you object, we must stop that processing unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or we need to process the information for the establishment, exercise or defense of legal claims. We will consider each case on an individual basis.

You may exercise your rights or make a request regarding your information held by us, request further information about your legal rights under applicable law, or submit a complaint about our privacy practices by contacting us at any time, using the contact details set forth in the “Contact Information” section below.

We will consider all requests and provide our response within the time period stated by applicable law. Please note, however, that certain information may be exempt from such requests in some circumstances, which may include if we need to keep processing your information to provide services to you or to comply with a legal obligation. Moreover, you will not be permitted to examine the information of any other person or entity. We also may request you provide us with information necessary to confirm your identity before responding to your request.

## **YOUR CALIFORNIA PRIVACY RIGHTS**

California Civil Code Section 1798.83 permits customers of Eride Club who are California residents to request certain information, once per year, regarding our disclosure of their personal information (as defined by California law) to third parties for their own direct marketing purposes, or in the alternative, that we provide a cost-free means for consumers to opt out of any such sharing. To opt out of future sharing for these purposes, please send an e-mail to [info@erideclub.com](mailto:info@erideclub.com).

## **CONTACT INFORMATION**

If you have any questions about this Privacy Policy, would like to exercise your rights regarding your information that we hold, or would like to raise a complaint with us related to your information, you should contact us as follows:

### **Privacy Team**

[info@erideclub.com](mailto:info@erideclub.com)

1-424-398-0131