

# Privacy Policy

In this document, you will find in particular information about what personal data we collect, why we process it, how long we keep it and what privacy rights you can exercise.

## A. JOINT DATA CONTROLLERS

As the HoppyGo platform operates in different countries, we need to share the necessary information within our affiliates so that you can use our services uninterrupted wherever you are.

Who manages your data:

HoppyGo s.r.o., Identification number: 06628664	HoppyGo platform owner
HoppyGo Czechia s.r.o., identification number: 07799586	Data controller for the Czech Republic
HoppyGo Poland SP. Z o o, Identification number: 0000818732	Data controller for Poland
HoppyGo Slovakia s.r.o. Identification number: 53514106	Data controller for Slovakia

Specifically, we share data as follows. In the event that you register as a user of the HoppyGo platform, HoppyGo s.r.o., which is the administrator of the HoppyGo platform, becomes the controller of your personal data, as well as HoppyGo of the country in which you register. So, for example, in case you create your first registration in the Czech Republic, HoppyGo s.r.o. will be the joint controller of your personal data with HoppyGo Czechia s.r.o.

HoppyGo companies from other countries will not have access to your personal data. In the event that you log into the HoppyGo platform from a country other than the country of your initial registration, and in the event that you wish to rent a car through the HoppyGo platform in a country other than the country of your initial registration, the HoppyGo company from that other country will also become a joint controller of your personal data. This is so that we can provide you with our services there as well.

The processing takes place as part of the following activities:

## B. DESCRIPTION OF THE PERSONAL DATA PROCESSING

### 1. REGISTRATION OF THE USER AND OWNER OF THE VEHICLE

**Description of the purpose of processing**

We process personal data you provide in order to register you as a user of the HoppyGo platform or as a vehicle owner and to enable you to rent or offer vehicles. We will also verify the information provided by users or vehicle owners in order to assess compliance with the terms of service. The check includes verification of users' information in the executions register and insolvency records to protect the rights of vehicle owners and HoppyGo and to prevent bad debts. As part of the registration process, we will automatically process information from your identity documents and photographs to establish and verify your identity, to defend the legal claims of us and our customers and to prevent fraud where appropriate. This processing includes automated text reading, document and photo authentication, including the evaluation of biometric indicators.

We have the right to cancel an application for registration or even an already approved registration, in particular in the event of the discovery of executions or insolvency proceedings. Following the submission of your registration application, we may require you as the owner of the vehicle to provide additional documents in addition to the registration information, such as consent from the owner or co-owners of the vehicle you wish to lease through the HoppyGo platform, if applicable. We may additionally request this information from users already registered as owners.

### **Description of the legal basis for processing**

We carry out the processing of the registration data for the conclusion and performance of the contract. We verify information in registers and records on the basis of our legitimate interest in operating a transparent, safe and reliable platform and to check the legal prerequisites for using our services. If, in relation to certain personal data, explicit consent to processing is required by specific legislation, we only process your personal data if you have given your consent (this applies to the processing of data from uploaded documents including biometric data). However, where the information is necessary for the conclusion or performance of a contract, this consent is a condition for the approval of the registration.

### **Categories of personal data we process**

Identification data; contact details such as email address and telephone number; in the case of registration via a social media profile, your name, profile photo and registered email; copy of driving licence; payment and transaction details; descriptive data relating to the service; communications relating to the service, vehicle data - e.g. make and model of vehicle, date of manufacture, VIN, number plate, mileage etc.

For the purpose of identity verification from the provided document, identification and contact data are processed - the exact scope depends on the specific document, but usually includes name, gender, date of birth (age), identification number (if indicated on the document), nationality, citizenship, residential address, information about the document - type of document, country of issue, number, validity, machine-readable identifiers, security features, or other information indicated on the document; photo information - biometric indicators from the photo (multidimensional face vectors), technical data - user identifier, time stamp, IP address and domain, location (city, country), information on the device (camera) and software used for authentication.

### **Duration of processing**

We process personal data for the duration of the contract and subsequently subset of data is archived to defend our rights based on legitimate interest.

### **Categories of other processors or recipients to whom we may disclose personal data**

Your personal data may be disclosed to the extent necessary to our business partners providing IT and other administrative and business support services.

Identity verification from the provided document is carried out by Sum and Substance Ltd (based in the UK). More about this processing [here](#).

We also work with a company Credit Check s.r.o. to check executions and insolvency registers and records.

### **Origin of personal data**

Directly from you, from publicly available registers, particularly commercial, execution and insolvency registers.

### **Transfer of personal data to third countries or international companies**

In the context of the above processing, with the exception of cooperation with Sum and Substance Ltd in the UK, your personal data will not be transferred to third countries outside the European Economic Area ("EEA") or to international organisations.

### **Automated decision making based on personal data**

There is no automated data processing involved in this processing.

## **2. VEHICLE RENTAL, TRANSACTIONS AND PAYMENT PROCESSING**

### **Description of the purpose of processing**

We process the data in order to be able to process vehicle rental requests and to connect users with owners. This also requires that certain data (including data in the form of ratings from other users) is made available to other users of the platform in their role as drivers or owners, in particular your basic identification data (name and surname), vehicle data or other data that you have voluntarily provided to us. Other personal data you provide (more detailed identification, contact and transaction data) will only be disclosed if you are interested in concluding a rental agreement.

When you use one of the offered vehicles, we then process information related to your ride. Vehicles from the HoppyGo fleet are equipped with location tracking so that you can easily find and take possession of them.

### **Description of the legal basis for processing**

The processing is carried out to enable users to benefit from vehicle rental services. The provision of personal data is a contractual requirement necessary for the provision of services.

### **Categories of personal data we process**

Identification data; contact data; descriptive data; communication with other users of the platform; user ratings; vehicle location data if you rent our own vehicle; data on the availability of the rental vehicle; transaction and payment data; mileage, information on possible offences and traffic accidents; data on the current state of the vehicle (e.g. cleanliness of the vehicle, technical condition of the vehicle, etc.).

### **Duration of the processing**

We process the personal data for the duration of the contract and subsequently subset of data is archived to defend our rights based on legitimate interest (until any claims are time-barred).

### **Categories of other processors or recipients to whom we may disclose personal data**

Uniqa pojišt'ovna a.s., other users of the platform (only to the extent necessary), business partners providing IT and other administrative and business support services. Public authorities, in particular courts, police and other law enforcement and offence resolution authorities to the extent necessary and within the limits of the law.

### **Origin of personal data**

Directly from you or your use of the service.

### **Transfer of personal data to third countries or international companies**

As part of the processing described above, your personal data will not be transferred to third countries outside the EEA or to international organisations.

### **Automated decision-making based on personal data**

There is no such processing in the context of this processing.

## **3. ARCHIVING OF PERSONAL DATA**

### **Description of the purpose of processing**

If the contract for the procurement of the rental opportunity you have concluded with us is terminated, e.g. also by cancelling your registration (whether as owner or driver), we will continue to process your personal data after cancellation of your account to the extent necessary for our protection against any claims related to us. Similarly, we will retain data in the event that you have applied to register as an owner user and your application has been rejected or your account has been terminated on our initiative after your registration (whether as an owner or driver).

### **Description of the legal basis for processing**

We have a legitimate interest in carrying out this processing. This legitimate interest consists of defending ourselves against any claims made against us.

### **Categories of personal data we process**

Identification data; contact data; descriptive data; communication with other users of the platform and us; location data (e.g. if you do not return the rented car at the agreed time); transaction and payment data; vehicle status data, data for which registration has been refused or user account has been cancelled.

### **Processing and archiving time**

We store the data for the time necessary to protect our rights, i.e. until the expiry of the statute of limitations on any claims or their final settlement.

### **Categories of other processors or recipients to whom we may disclose personal data**

Your personal data may be processed to the extent necessary by our business partners providing IT and other administrative and support services or provided to public authorities, in particular to courts, police and other law enforcement authorities and authorities dealing with misdemeanours, upon request, to the extent necessary and within the limits of the law.

### **Origin of personal data**

Directly from you or your use of the service.

### **Transfer of personal data to third countries or international companies**

As part of the processing described above, your personal data will not be transferred to third countries outside the EEA or to international organisations.

### **Automated decision-making based on personal data**

There is no such processing in the context of this processing.

## **4. SENDING COMMERCIAL OFFERS OF OUR PRODUCTS AND SERVICES AND INFORMING ABOUT NEW PRODUCTS AND SERVICES**

### **Description of the purpose of processing**

We process your data for the purpose of informing you about commercial offers of our products and services and about news related to our activities.

### **Description of the legal basis for processing**

The processing is based on a legitimate interest in communicating up-to-date information and offering you further information about our products and services that are relevant to you and may be of interest to you.

### **Categories of personal data we process**

Identification data; contact data; account data; service usage data; data on available vehicles, reviews and related communications.

### **Duration of processing**

We process your personal data for the duration of your contractual relationship with us, or until you unsubscribe from the newsletter.

### **Categories of other processors or recipients to whom we may disclose personal data**

Marketing agencies, analytical and statistical companies.

### **Origin of personal data**

Directly from you or from the use of our services.

### **Transfer of personal data to third countries or international companies**

As part of the processing described above, your personal data will not be transferred to third countries outside the EEA or to international organisations.

### **Automated decision-making based on personal data**

There is no such processing in the context of this processing.

## **5. QUALITY ASSURANCE OF SERVICES, PRODUCTION OF ANALYSES, REPORTS AND STATISTICS**

### **Description of the purpose of processing**

In order to properly ensure the functioning of the services we provide and to improve them, we need to process information about their use, including personal data, for the creation of analyses, reports and statistics. If the contract with you is terminated, for example by cancelling your registration, we will continue to process your personal data, but only to the minimum extent necessary for the production of reports and statistics.

### **Description of the legal basis for processing**

We have a legitimate interest in carrying out this processing. This legitimate interest is to ensure the proper functioning of the services we provide and to improve their quality.

### **Categories of personal data we process**

Identification data; contact data; platform account data; vehicle information; service usage data; ratings and related communications including recorded customer support calls; internal control and investigation data; location data; network identifiers.

### **Duration of processing**

We process your personal data for the duration of your contractual relationship with us and for a period of 3 years after the end of the contract. We use telephone calls to check the quality of the services provided for a period of 3 months.

### **Categories of other processors or recipients to whom we may disclose personal data**

IT infrastructure provider (Spinoco Czech Republic, a.s.), analytical and statistical companies.

#### **Origin of personal data**

Directly from you or from your use of the platform.

#### **Transfer of personal data to third countries or international companies**

As part of the processing described above, your personal data will not be transferred to third countries outside the EEA or to international organisations.

#### **Automated decision-making based on personal data**

There is no such processing in the context of this processing.

## **6. COMPLIANCE WITH OUR LEGAL OBLIGATIONS**

#### **Description of the purpose of the processing**

We are subject to obligations under selected legal provisions that we must comply with, which include processing of your personal data. We will therefore process your personal data, but only to the extent necessary and only for the period defined below.

#### **Description of the legal basis for processing**

We process your personal data on the basis of legal obligations, in particular in the field of tax and accounting.

#### **Categories of personal data we process**

Identification data; contact data; account data within the service; data on the use of the service (transactions and payments).

#### **Duration of the processing**

We process your personal data for as long as we are required to process it by the relevant legislation.

#### **Categories of other processors or recipients to whom we may disclose personal data**

External tax, accounting and legal advisors; IT infrastructure providers.

#### **Origin of personal data**

Directly from you or from your use of the platform.

#### **Transfer of personal data to third countries or international companies**

As part of the processing described above, your personal data will not be transferred to third countries outside the EEA or to international organisations.

#### **Automated decision-making based on personal data**

There is no such processing in the context of this processing.

## **7. COMPLIANCE WITH OBLIGATIONS TOWARDS THE TAX ADMINISTRATION**

### **Description of the purpose of processing**

The DAC7 Directive (Council Directive (EU) 2021/514) imposes a legal obligation on us to share the data of platform users who derive income from the rental of vehicles if the user is resident in an EU Member State or if the income is derived from the offer of rental vehicles in the EU.

We collect your data to enable us to comply with our legal obligations under DAC7.

### **Description of the legal basis for processing**

We process your personal data on the basis legal obligations.

### **Categories of personal data we process**

The name of the lessor, the lessor's residential or registered office address (even if not in the Czech Republic), date of birth, VAT number/place of birth, identification number and details of any premises, the lessor's bank account, the address where the vehicle is usually hired, the lessor's total income from the platform for each quarter.

### **Duration of the processing**

We are obliged by law to archive your personal data for a period of 10 years.

### **Categories of other processors or recipients to whom we may disclose personal data**

We will share your data with the tax authorities for DAC7 compliance purposes. The tax administration will then share this data with the tax authorities in the EU member state(s) where you reside and/or where your vehicle rental offer is located.

### **Origin of personal data**

Directly from you or from your use of the platform.

### **Transfer of personal data to third countries or international companies**

As part of the processing described above, your personal data will not be transferred to third countries outside the EEA or to international organisations.

### **Automated decision-making based on personal data**

There is no such processing in the context of this processing.

## **C. OTHER RECIPIENTS OF DATA**

In addition to the data recipients listed for each of the processing purposes, we use the services of:

- ŠKODA X s.r.o., ID No.: 05976359. The subject of cooperation is mainly administrative, marketing, financial or analytical activities.

In the event that something changes in our company and we transfer our business or other activities in whole or in part to another person (including assignment of contracts), then such transfer would include personal data relating to these activities. For these purposes, information (including personal data) relating to our business may be shared with other parties in order to evaluate and conclude the transaction. This would also be the case if we were required by law to make such changes.

## **D. WHAT RIGHTS DO YOU HAVE?**

You have the following rights related to the processing of personal data:

1. Access to the personal data processed.
2. Withdraw consent to the processing of personal data, if the processing is based on consent.
3. Correction of inaccurate or incorrect data or completion of incomplete data.
4. Erasure of personal data in case of termination of the purpose or unlawful processing. In particular, erasure cannot be carried out if the processing is a legal obligation or necessary for the defence of our legitimate interests and rights.
5. Restriction of the processing of personal data.
6. Export of specified personal data in a structured and machine-readable format for yourself or for another controller.
7. Object to the processing of personal data based on legitimate interests if you believe that the processing is not justified.
8. Not to be subject to automated decision-making unless the conditions for it are met. In the event that an automated individual decision is made which has substantial consequences for you (e.g. would lead to the non-execution of a contract, refusal to pay a benefit, change of the terms of a service agreed, etc.), you have the right to have such decision reviewed, to comment on it and, where appropriate, to challenge it.

## **E. HOW CAN YOU EXERCISE YOUR RIGHTS?**

You can use the following contacts to communicate with controllers regarding data protection and to communicate with the Data Protection Officer we have appointed:

Electronically: [dpo\(@\)hoppygo.com](mailto:dpo(@)hoppygo.com)

By phone: +420 220 311 769

Current contacts can be verified at <https://hoppygo.com/contact>.

Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may either: (a) charge a reasonable fee, taking into account the administrative costs of providing the information or communication or taking the action requested; or (b) refuse to act on the request.

## **F. POSSIBILITY OF FILING A COMPLAINT**

If you do not agree with the manner by which we process your personal data, in order to protect your rights, you can file a complaint with the supervisory authority.

Address: Office for the Protection of Personal Data, Pplk. Sochora 27, 170 00 Praha 7

Telephon: +420 234 665 111 Web: <http://www.uoou.cz>

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