

# NETLIFT PRIVACY POLICY

## 1. INTRODUCTION

With all the new communication tools available, we need to take extra measures to protect one's privacy. This is why at Netlift Social Transportation Inc., (hereinafter referred to as "Netlift"), we take our Users' (hereinafter defined) personal information, as well as compliance with applicable laws, very seriously.

This Policy (hereinafter the "Policy") is intended for drivers, taxi drivers, passengers, and any other individual using our services (hereinafter the "User" and the "Users"). Its purpose is to outline the personal data we may collect from our Users to operate our business, why we collect it, how it's used and shared with third parties, when applicable. The Policy is designed to comply with Canadian privacy laws and, where applicable, the General Data Protection Regulation ("GDPR").

## 2. SCOPE OF POLICY

This Policy applies to personal data we own or manage, including data collected when using the Netlift mobile application (the "Application"), the web platform for corporate clients (the "Platform") or when browsing Netlift's website ([www.netlift.me](http://www.netlift.me)).

## 3. CONSENT

Your consent to the collection, use or disclosure of your personal information must be manifest, free, and informed. It must be given for specific purposes and in such a way that you understand the nature, purposes, and consequences of the collection, use and disclosure of your personal information. Depending on the nature and sensitivity of your personal information, your consent may be express (such consent may be given orally, in writing or electronically) or implied (for example, when you voluntarily provide personal information).

Generally, we obtain your consent in regard to the collection, use or disclosure of your personal information at the time of collection, except where otherwise required or permitted by law.

Your consent may be withdrawn at any time, subject to legal and contractual restrictions and reasonable notice. Please note that if you choose to withdraw your consent, we may not be able to make certain services or features of the Application or Platform available to you.

## 4. DATA COLLECTION

By using our Application or Platform, or by browsing our website, you may be required to log personal information, some of which will be used to identify you. We may obtain this information when you create a user account (hereinafter the "Account") and choose a password or when you use the Application to browse the various pages and services.

The following information may be collected from Users of our Application, Platform or website:

- Last name
- First name
- Email address
- Phone number
- A photograph
- Employer, position, employee number if required to access benefits offered to an organization
- The details of the ride requests and offers created on the Application
- Frequency of use of our services and ride history
- Chat conversations with our customer service team, as well as with other Application Users
- Details of your sessions on the Application and content browsed
- Information related to your location (when you use the Application to manage or hop on a ride)
- A copy of your driver's license
- Information about your vehicle: registration, make, model, year of manufacture, colour of your vehicle or any other similar document that you have agreed to provide
- Any other information that may be required

Some personal information may be collected through forms, for example:

- Application registration form
- Carpooling program subscription form
- Booking form (via the Platform)
- Survey
- Contest

- Others

Your information is also collected through the interaction that may occur between you and the Application or our website and may be used for the purposes identified thereafter. We may also collect feedback from other Users about their carpooling experience with you as part of the services we offer. This feedback is used for internal purposes only, to ensure service quality and compliance with our policies.

Your personal information will not be retained any longer than necessary to fulfill the purposes for which it was collected, nor used for other purposes.

Our Application, Platform, and website are designed for adult use only.

For more information on data privacy and your rights therein, you may contact law enforcement authorities:

- In Canada (federal authority): Office of the Privacy Commissioner of Canada ([www.priv.gc.ca](http://www.priv.gc.ca))
- In Quebec: Commission d'accès à l'information du Québec ([www.cai.gouv.qc.ca](http://www.cai.gouv.qc.ca))
- In France: Commission nationale de l'informatique et des libertés ([www.cnil.fr](http://www.cnil.fr))

## 5. AUTOMATICALLY EXCHANGED DATA

In addition to the personal information identified below, data sharing occurs between your computer or smartphone and our servers.

Every time you access our website or use the Application, we may collect, where applicable, data related to the device or network on which you access the website or open the Application (including, but not limited to, your IP address, login details, type of web browser and version, plug-in type and version, operating system and platform, device advertising ID), browsing history data, including the various URLs on our Platform or website, the content you access or view, search terms used, download errors, the amount of time spent on certain pages, interactions with the page and any phone number used to contact us, as well as your geographic location. We use cookies as one of the technologies to collect this data.

We also collect information about your use of our Application and Platform (such as ride created, messaging response rate, signup date, average User feedback received, etc.) that may be displayed on your public profile.

All your information is safely stored on our servers. When you accept and confirm a ride with one or more Users, your geographic location may be shared with that other User to help with mutual tracking.

Collecting such information allows us to improve our services, customize your experience, and better track your requests and Netliff's rendered services.

## **6. USE OF YOUR PERSONAL INFORMATION**

We may use your personal information to:

1. offer you door-to-door carpooling, parking management and/or delivery optimization services, including electronic payment features;
2. establish, maintain, and manage our business relationship with you in order to provide you with a customized service;
3. process your requests and answer your questions about the status of aforementioned requests;
4. communicate with you (by email, mail or otherwise) and send you information about our products, services, surveys, contests, promotions, and special offers;
5. learn more about your preferences as a User;
6. carry out analysis, reports, statistics, market research, and research to rate our customer service, measure our performance, enhance the experience we provide our customers and improve our services;
7. feed research and development work in order to improve the capabilities of our tools (the data used in this context is always anonymized).

## **7. SHARING OF PERSONAL DATA**

The disclosure of your personal information to a third party requires your consent, except in certain cases as outlined below and where permitted or required by law.

In accordance with applicable laws, personal information about you may be disclosed, without your consent, to, but not limited to, the following persons:

1. Current or future Netliff affiliates;
2. Service providers and business partners, including our corporate clients and taxi company affiliates, if needed to achieve set goals for which the information was provided or collected;
3. A person or organization with the power to compel the disclosure of information if required to carry out its responsibilities or duties, such as complying with a subpoena, warrant or rules of procedure to produce records;
4. A person or organization responsible by law for the prevention, detection or suppression of crime or breach of law that needs access to the personal information to perform its duties and if necessary to prosecute under applicable laws;
5. A person required to disclose the information under applicable laws;
6. Representatives and advisors, including our accountants or legal counsel.

Access to your personal information within our company also does not require your consent, but is strictly limited to those individuals who require the information to carry out their duties and responsibilities. Unauthorized access or disclosure of your personal information by an employee is strictly prohibited and may result in disciplinary action.

If a third party to whom we disclose personal information about you is located in a foreign jurisdiction, applicable law in that jurisdiction may allow the disclosure of your personal information to government authorities without your consent, for example in response to a valid subpoena or court order lawfully issued as part of an investigation.

## **8. COMMUNICATION WITH YOU**

If you have not provided express or implied consent, you will not receive any emails from us, except in specific cases (ie. follow-up or expiry of your subscription, participation in a contest, etc.), in accordance with *Canada's anti-spam legislation*.

To unsubscribe from our e-mailing list, simply contact us at [support@netlift.me](mailto:support@netlift.me).

Remember to include your full name and the email address you used when you signed-up on the Application or made a purchase from us. There may be a delay in processing, during which time you may continue to receive communications from us.

## **9. THIRD-PARTY SERVICES**

We use third party services to help with the management of our Application, Platform or website. In no event shall we be liable for any damages that may arise from such third party services. Please consult their respective policies for further details on their terms and conditions of use. These third party services include, without limitation, management, analysis, payment, and email exchange softwares.

## **10. RIGHT TO OBJECT AND TO ERASURE**

We are committed to providing you with the right to object and the right to erasure with respect to your personal information.

The right to object is defined as the possibility to object to the processing of your personal information for certain purposes mentioned at the time of collection.

The right to erasure is defined as the possibility to request that your personal information no longer appears, for example, on a mailing list.

You also have the right to request access to your personal information and the right to rectification if necessary. You may submit a request to the contact person listed in the "Contact Person" section below.

## **11. SAFETY**

The personal data we collect is kept in a secure environment. We have put in place appropriate measures to maintain the privacy of personal data and to protect it against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, taking into account, among other things, the sensitivity of the data and the purposes for which it is to be used. In addition, we require each employee, agent or representative to comply with this Policy.

To ensure the safety of your personal information, we rely on the following measures:

- SSL (Secure Sockets Layer) protocol
- Access management - authorized person
- Access management - data subject
- Network monitoring software
- Computer backup
- Login/Password
- Encryption of sensitive data (e.g. password)
- Canadian or foreign server

We are therefore committed to maintaining a high degree of confidentiality by integrating the latest technological innovations to ensure the safety of your transactions in order to protect your personal data and prevent it from being consulted, used or disclosed without authorization.

However, since no mechanism offers flawless security, there is always a certain risk associated with transmitting personal data over the Internet. If a password is used to protect your Account and personal information, it is your responsibility to ensure that it remains confidential.

## **12. CONTACT PERSON**

You may exercise your rights set out in this Policy or contact us with any other questions or complaints about our privacy procedures by reaching out to our customer service department:

Contact person: Guillaume Boudreau

Mail: 500-215 St-Jacques Street West, Montreal, Quebec, Canada H2Y 1M6

Email: [dpo@netlift.me](mailto:dpo@netlift.me)

Telephone: 514-316-9225

## **13. PROCESSING OF PERSONAL INFORMATION OF PERSONS WITHIN THE EUROPEAN ECONOMIC AREA (EEA)**

This section shall apply exclusively to the processing of EEA-related personal information, insofar as such processing takes place while the data subjects are within the EEA and where data processing relates to goods or services offered or the monitoring of a person's conduct within the EEA. In case of conflict, this section's provisions shall take precedence over the provisions of this Policy.

### **13.1 Consent**

If your consent is provided in a written statement that addresses other matters, we will ensure that the request for consent to process personal data is clearly separate. We will require your express consent to process personal data relating to ethnicity, sex life or sexual orientation, political opinions, religious or philosophical beliefs, trade union membership, health data or genetic or biometric data.

### **13.2 Collection, retention, and use of personal information**

As noted above, we will not retain personal information longer than is necessary to fulfill the purposes for which it was collected and will take reasonable steps to indicate in advance the duration for which that personal information may be retained or the criteria for determining said-duration.

### **13.3 Automated individual decision making**

We recognize that you have the right to know whether your personal information is processed by an automated decision-making system. Upon request, we will provide you with information on the functioning of this automated system. Unless required or permitted by law, you have the right to refuse that a decision based exclusively on an automated system be made about you, when that decision has legal consequences for you.

## 13.4 Privacy Impact Assessment

We will conduct a privacy impact assessment before implementing new technologies that are highly likely to infringe on your rights and freedoms, including your right to privacy.

## 13.5 Right to erasure

Where required by law, you have the right to request that we remove and erase personal information without unreasonable delay.

## 13.6 Accuracy and protection

We will put in place appropriate technical and organizational measures to ensure the protection of personal data, such as limiting collection and enforcing pseudonymisation.

We will only share personal data with other affiliates or with outside agents, representatives, consultants, data processing companies or external service providers when they guarantee that appropriate measures have been put in place to protect personal data. The processing of personal data by agents, representatives, consultants, data processing companies or external service providers is governed by a contract or other type of legal document.

## 13.7 Liability

We are liable for data privacy and are able to demonstrate that we are GDPR-compliant with respect to processing personal data. To this end, we maintain a record of processing, where required, and provide privacy training to our employees.

## 13.8 Right of access, rectification, and portability

We take the necessary measures to facilitate the exercise of your right to access, your right to rectification or your right to portability with regards to your personal information. You can always obtain confirmation from us that your personal data is being processed.

Any edits to or deletion of your personal information will be communicated to third parties to whom the data has been disclosed.

# 14. PRIORITY

If a definitional or interpretation issue arises between the English and French versions of this Policy, the French version shall prevail.



## **15. POLICY CHANGE**

We occasionally update this Policy.

We reserve the right to modify or supplement this Policy at any time, at our sole discretion. You should consult this document regularly by referring to the date of the last modification indicated at the bottom of the document.

If you object to any change to this Policy, please stop using the Application and send us written notice within 30 days of the effective date of such change to cancel your contract with us.

*Last updated on August 3, 2020.*