

## **Mobiliti, LLC**

### **Privacy Policy**

Mobiliti, LLC (“Mobiliti”, “we”, “us” or “our”) respects your privacy. This Privacy Policy is meant to help you understand what data we may collect through our interactions with you, why we collect it, and what we do with it. Please read it carefully; this is important.

This Privacy Policy covers the collection and use of information when you use our website and Mobiliti’s related mobile sites and applications (collectively our "Platform"), as well as the kinds of information we collect when you enroll in our subscription program (the “Program”) and use our services. By using our Platform and providing your information, you consent to the collection, use, and disclosure of your information, as described in this Privacy Policy. If you do not agree with the terms of this Privacy Policy, please do not submit any personal information to Mobiliti. If you have any questions or concerns regarding our Privacy Policy, please contact us using the contact information provided below.

#### **Information We May Collect**

When you use our Platform and/or participate in our Program, we will or may collect information about your device such as IP address, browser type, device location, unique device identifier, cookie data, associated identifying and usage information from your mobile phone, laptop, or other device, and other device information that you give us consent to access, such as photographs. Our servers automatically log certain information about your use of our Platform, such as your IP address, your browser type, operating system, browser language and service provider as well as information about your activities on our Platform, such as the pages you visit or the links you click to follow. The first time you visit our Platform, Mobiliti assigns you a unique number, which is stored in one or more cookies on your computer's hard drive. These cookies help us distinguish new visitors from returning visitors and enable us to measure the effectiveness of content on the Platform

and refine and tailor that content to suit visitors' interests. If you've become a subscriber or provided other personal information about yourself (for example, if you send us an email), your cookie ID can be associated with you personally.

Mobiliti collects information that you voluntarily submit to us, such as your name, address, telephone number, email address, a photo of you or other identifying documents. This includes information in your profile or information you provide us via email, text message, phone or similar communication which may be monitored or recorded for training, quality control, fraud detection, dispute resolution or similar reason. By your acceptance of this Privacy Policy and your communication with us by one of these means, you are consenting to the recording and monitoring of your communication with Mobiliti.

When you enroll in the Program, you provide us with your payment information which includes, but may not be limited to, your credit card number, CVV, expiration date, and the billing address associated with the credit card. You may also provide new information to update this information from time to time. A third party that handles payments for us will receive your card information. To keep your financial data secure, we do not store full credit card information on our servers. In completing the sign-up process, we will also collect your driver's license information including the number, the issuing jurisdiction and an image of your driver's license.

Mobiliti works with third party suppliers to perform driving record and credit history checks on all applicants, and we receive information from these third parties such as publicly available information about a subscriber's driving record and the applicant's credit history or credit score.

Mobiliti will collect information about the vehicle(s) you drive. Some vehicles may be equipped with Global Positioning System ("GPS") vehicle tracking technology and anti-theft technology that uses GPS. GPS is a network of satellites that allows us to determine the location (latitude and longitude) of

vehicle during your subscription. Additionally, vehicles may be equipped with telematics data tracking technology. The use of vehicle telematics is becoming increasingly common in the automotive sector and it enables companies like Mobiliti to better understand how vehicles are being used, hopefully leading to better services for subscribers. Vehicles may also have an on-board device that may monitor the state of the vehicle from moment to moment, including its location which allows us to monitor driver behavior and encourages responsible and safe driving.

In addition to location and usage information we may utilize these GPS and telematics data tracking technologies and other reporting tools, to collect information regarding the vehicle such as license plate number, vehicle identification number (“VIN”), mileage, interior or exterior damage or repairs, oil/battery status, fuel or charging history, mechanical issues and repairs, recall information and repairs, electrical system function, running time and diagnostic trouble codes. We may also collect other information regarding your use and operation of the vehicle(s) such as speed, air bag deployments, crash avoidance alerts, impact data, safety system status, braking and swerving/cornering events, event data recorder (“EDR”) data, seat belt settings, vehicle direction, trip start/end time and date, camera image and sensor data, voice command information, stability control or anti-lock events, security/theft alerts, infotainment system and WiFi usage.

### Our Children’s Policy

We do not knowingly collect solicit or collect, nor are is our Platform intended to be accessed by children under the age of 18 or your country's age of minority.

### How We Use the Information We Collect

We use the information we collect for the following purposes:

- To provide you access to our products and services and assist the transactions that you request, such as reserving and renting vehicles.
- To improve the quality, safety, and security of our products and services and develop new products and services.

- To communicate with you, maintain or improve our customer relationships and provide customer service related to your interactions or with us or your inquiries.
- To verify your identity for fraud prevention purposes.
- To administer your account and verify your identity.
- To contact you regarding an incomplete online subscription enrollment, and error in processing subscription or a need to update your account information.
- To contact you about a citation or claim.
- To process your payments for products or services.
- To provide you information regarding your vehicle(s) or your subscription(s).
- To provide you with discounts, coupons, offers and other information, opportunities, and services that may be of interest to you. You may receive these offers in advertising via third-party sites and media properties, including in social media. You may be able to opt-out of these ads by clicking on an icon in the ad or through the privacy settings in each media property.
- To operate our Platform.
- To assist us in providing better products and services; for example, evaluating the performance of our staff, to assess the quality of product and service received and to help us improve our Platform and services.
- To compile statistics and analysis about our customers' use of our Platform, products and services, which statistics are only used to enable us to provide better customer service, products, features and functionality to you and other customers in the future.
- To protect our rights and property.
- To comply with legal, regulatory or contractual requirements.
- To provide product and service updates.
- To protect your safety and the safety of others.
- To customize and improve communication content and your experience with Mobiliti.
- To provide customer and vehicle support and service information.

We may combine the information that you submit to us with information related to your transactions with us, such as rental location and vehicle type. We may also combine this information with data we receive about you from third parties who assist us in processing requests, maintaining our data, and optimizing our services. Where required, we will anonymize your information in a way that it can't reasonably be associated with you or your vehicle(s). We may use anonymized information or share it with third parties for any legitimate business purpose.

We retain information we collect for commercially reasonable periods of time or in accordance with specific laws or policies. Information collected for a specified purpose will only be used for that purpose and, after a reasonable period of time, will no longer be actively stored when that purpose has been fulfilled. Inactive data may, however, continue to be used for statistical, marketing, archiving, and other analytical purposes.

#### How We May Share Information

We may share your information as follows for the following uses (and where required we will obtain additional consent or anonymize the information):

- We may disclose your information to other third parties:
- when required by law or in response to legal process;
- without legal process in response to a request from law enforcement relating to a criminal investigation;
- to protect our rights, privacy, safety or property, or of the public;
- for administrative or technical support or other business purposes to facilitate our transactions with you;
- to analyze our data, conduct mobile analytics services, or to maintain and improve our services (subject to confidentiality agreements as appropriate);
- to permit us to pursue available remedies or limit damage that we may sustain;
- to enforce the terms of any rental agreement or our Platform's or Program's terms and conditions;

- to process your transaction with our business partners;
- if the rights of another individual might be violated and;
- otherwise with your consent.
- We may disclose your information within the Mobiliti and any affiliated or related entities for the above uses.
- Your information may be shared with emergency service providers, such as law enforcement, roadside assistance providers, and ambulance providers.
- We may share your information with our business partners such as dealers, fleet or rental companies, to administer the terms of your subscription or for vehicle service or maintenance purposes, and marketing activities.
- Your information may be shared with our product and service providers who work on our behalf in connection with the above uses, such as companies that perform eligibility services, such as identity verification to prevent theft and fraud, companies that administer driver's license or consumer credit checks, companies that host and/or operate our Platform, send communications, perform data analytics, credit card processors, or system providers necessary to process, store, or manage credit card information.
- We may share your information in connection with a prospective or completed sale, transfer, or financing of a part of Mobiliti or its assets.
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#### How We Try to Protect Data

We use commercially reasonable administrative, technical, personnel, and physical security measures designed to safeguard information about you in our possession against loss, theft and unauthorized use, disclosure or modification. Of course, despite these measures, we cannot guarantee perfect security of networks, servers and databases we operate or that are operated on our behalf.

#### How Long We May Keep Your Data

We may keep the information we collect for as long as necessary to provide products or services to you, to operate our business, to enable us to communicate with you, for our safety, research, evaluation of use, or troubleshooting purposes, or to satisfy our legal or contractual obligations. Where required, we will anonymize or dispose of the information we collect when we no longer need it for the uses described above.

#### How We May Change this Policy

We may change this Privacy Policy from time to time, so it is advisable to review it frequently. Changes to this Privacy Policy will be announced on our Platform or through similar means and all amended terms shall take effect no less than seven (7) days after announcement.

#### How We Will Resolve Disputes

If you choose to visit or use the Platform, your visit and any dispute regarding privacy or this Privacy Policy is subject to this Privacy Policy, including limitations on damages, resolution of disputes, and application of the law of the state of Michigan.

#### How to Contact Us

If you have any questions or comments about this Privacy Policy, or if you would like us to update information we have about you or your preferences, please contact us by email at [privacy@mobiliti.com](mailto:privacy@mobiliti.com).