

## **USE OF VW MOVE APP, WEBSITE AND MOBILITY SERVICES**

VW MOVE, offered by Volkswagen Mobility Solutions Rwanda (“VW MOVE”), are committed to protecting and respecting any personal information you share with us. This statement applies to Personal Information provided to VW MOVE, its agents, partners, holding company and affiliates.

We are the Controller, responsible for your personal information, which means we decide why and how it is processed. It also means we are responsible for that processing, which extends to those of our service providers who process your information based on our instructions.

In other circumstances, the Processor receiving your information will be separately responsible to you and use your personal information in the ways described in its privacy statement (and not ours).

In accordance with Rwanda’s Law N° 058/2021 of 13/10/2021 relating to the Protection of Personal Data and Privacy (DPP Law), and other international laws on personal data and privacy, this privacy policy explains how VW MOVE will use your personal data when you make use of the VW MOVE App or visit our website.

This privacy policy tells you what to expect us to do with your personal information when you make contact with us or use one of our services. The information below describes processing of your personal information which we obtain through a variety of different interactions, including when you visit or make use of the App, website, social media pages, authorised partners or contact our customer services centre.

The contents of this statement may change from time to time so you may wish to check this page occasionally to ensure you are still happy to share your information with us.

### **(1) Registration**

When registering to use our VW MOVE App, you enter your login details. We use this information to set up your user account.

### **(2) Requesting VW MOVE Mobility Services and integration of map content**

#### **(a) Requesting a VW MOVE Mobility Services within the App**

When you request a VW MOVE Mobility Service, we use the location details in the request (starting point and destination) to present booking options and to calculate the best routes for our vehicles. We do not use location data to create a movement profile of you.

(b) Integration of map content

Location data is shared with the map provider in order to display maps in the VW MOVE App and to navigate you to your desired destination. The map content is integrated using Google Maps, a service provided Google. Location data that is sent to Google is always made anonymous.

**(3) Payment function**

(a) Payment service provider

Your payment details are transmitted to our payment service provider in order to complete the payment process. Our payment service provider is DPO Group (“DPO”), Avenue 5 Building, 00100 Rose Ave, Nairobi, Kenya. The transmission of your data takes place for the purpose of payment settlement with the payment service provider DPO.

To prevent and detect instances of fraud, the payment service provider's specific ID is encrypted.

**(4). Use of VW MOVE Mobility Services**

Mobility Services are defined as any of our MOVE SHARE or RIDE SHARE services or any other mobility services offered by Volkswagen Mobility Solutions Rwanda from time to time.

When you book a VW MOVE Mobility Service, we will associate the booking details and personal information as voluntarily provided by you to your user account, showing your previous trips in the VW MOVE App and dashboard.

In addition, your information will be shared with the provider performing the VW MOVE Mobility Service. Data processing by the VW MOVE Mobility Service provider occurs in accordance with this Privacy Policy.

The driver of the VW MOVE vehicle is able to access your name and mobile number for identification and contact purposes. Your location data is displayed in order to allow the driver to navigate to your collection point. Once the trip has ended, the driver is no longer able to see your location.

If there are any disruptions to the provision of our VW MOVE Mobility Services (e.g. your VW MOVE vehicle is delayed), we will use your contact details to notify you by in-app alert, or push notification.

## **5. Optimization of the Service Offering**

When you use the VW MOVE app and the VW MOVE mobility services we provide, your data will also be processed by VW MOVE for other purposes. Such processing of customer data serves the purposes of continuously developing our offers, advertising campaigns, and mobility concepts while making them more attractive for you. To this end we use transaction data from VW MOVE mobility services (e.g. booked trips) and information about how the VW MOVE app is used so that we can respond better to customer inquiries and reviews and offer discounts or vouchers in a more targeted manner. By processing your data, we can also continuously improve our customer service and customer satisfaction by being in a position to respond to customer inquiries more individually.

The legal basis for the additional processing of your data is Article 46 (7) of the DPP law in conjunction with the legal basis for the original processing in line with the fulfillment of contractual purposes or the protection of our legitimate interests. Insofar as additional data processing is based on Article 46 (7) of the DPP Law, our legitimate interests lie in increasing our service quality, improving customer communication, optimizing our offers, and ensuring that our advertising measures can be fully evaluated and improved.

We will store your data for additional processing as long as you use the VW MOVE app or our VW MOVE mobility services, and we will delete your data after the statutory retention periods have elapsed. Further information on exercising your rights as a data subject can be found in the section headed "General Conditions" of this data protection statement.

## 6. Push notifications

Our VW MOVE App offers push notifications, which are messages created by the VW MOVE App that can be displayed on your device. You can decide at any time whether you want to allow push notifications or not by adjusting directly on your device.

## 7. Personalized marketing

We aim to send you messages that are of interest to you. For this reason, we ask for your consent to the following during the registration for our VW MOVE App:

"I am at least 16 years of age and would like to receive personalized information about services, offers, products, and surveys from VW MOVE by e-mail, text message, push notification, or through advertisements (e.g. via social media). Data about location, usage, and content will be combined for this purpose. I have read the privacy policy. You have the right to withdraw your consent at any time."

Your consent is optional. With your permission, we will use the information below to determine whether certain content is of interest to you:

## 8. Data Types Processed

**Registration data** (e.g. email address, phone number first name, last name)

**Usage and Booking data** (e.g. trip history, spending, starting points and destinations),

**Location data** (When processing locations, VW MOVE may use location-based services such as WLAN, GPS, or Bluetooth, which are used for data transmission. Localization only takes place in close proximity to our virtual VW MOVE stops and inside our VW MOVE vehicles. The storage of location information is temporary

Consent is granted for the following marketing channels:

**Email, SMS, WhatsApp, Push notifications** (if enabled on your device), **In-app notifications, Advertising on third-party websites** (where Cookies are selected), **Advertisements within the online and social media advertising networks** You may withdraw your consent to receiving personalized marketing information at any time with effect to the future. To do so, select the unsubscribe link contained in each e-mail we send out.

Please note that it can take up to 48 hours to process your withdrawal of consent for technical reasons.

The legal basis for processing your personal information for personalized marketing is your consent (Article 46(1) DPP).

## **9. How to prevent unauthorised marketing**

You can prevent the transmission of the advertising identifiers if you activate the option "no ad tracking" for iOS under "Settings" - "Privacy" - "Advertising" or the option "disable personalised advertising" for Android under "Settings" - "Google" - "Ads". You also have the option to delete the advertising identifier at any time in the device settings (iOS: "Reset Ad ID"; Android: "Reset Advertising ID"). A new identification number will then be created for your device, which will not be merged with the previously collected data.

## **10. VW MOVE booking by Customer Call Centre or Authorised Partners**

A VW MOVE trip can be booked for you by our call centre agents or by one of our authorised partners at a hotel or the airport. You do not need to directly book your next ride on the VW MOVE app for these trips but must provide the call centre agent or authorised partner with the data required for the booking. Their processing is described below.

### **What kind of data is processed?**

We distinguish between two types of data based on their purpose to be processed. By providing this information you consent to the processing of your data for the provision of mobility services to you. This data is collected by the authorised partner and stored in our database to offer you a mobility service as described above (legitimate interest). The legal basis for this processing is Art. 46 (1) of the DPP Law.

- trip booking-relevant data (traveller first name, last name, starting point, destination, number of passengers, time and date).
- billing-relevant data (first name, last name, room number, time and date) from our authorised partners (e.g., hotels) who book a trip for you.

### **Retention periods**

Your personal data will only be processed and stored as long as the purpose or the law requires.

## **How do we protect and safeguard your information?**

All personal data collected are internally processed only by designated staff members, and are stored on servers which abide by prescribed Technical and Organisational Measures and in compliance with the DPP Law.

## **Visiting Other Websites**

Our website may contain links that redirect to other institutions. These websites are not within our control and may not follow the same privacy, security, or accessibility policies. Once you head to another site, you are subject to their policies.

## **What data do we collect and further process, and how?**

As a general rule, VW MOVE does not collect your personal data when you visit our website unless you choose to provide information to us.

Submitting your personal data through our website is voluntary. By doing so, you are giving us permission to use the information for the specific purposes mentioned above.

The following data (including personal data) will be collected through forms found on our website:

- Name (Last name and First name);
- Email address;
- Phone number;

## **Transfers outside of Rwanda:**

Due to the international nature of our business, there may be some instances where your information is processed or stored outside of Rwanda. In those instances, we will take reasonable measures to ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law.

## **How can you manage the information we hold about you?**

You have the right as an individual to access your personal information we hold about you and make corrections if necessary and the right to object to the processing of your personal information. You also have the right to withdraw any consent you have previously given us and ask us to erase information we hold about you. You can also object to us using your personal information (where we rely on our business interests to process and use your personal information).

In relation to most rights, we will ask you for information to confirm your identity and, where applicable, to help us search for your personal information. Except in rare cases, we will

respond to you within 30 days after we have received any request (including any identification documents requested).

**You have the right to:**

1. Ask for a copy of the information that we hold about you;
2. Correct and update your information;
3. Withdraw your consent (where we rely on it). Please see further How do we use this information;
4. Object to our use of your information (where we rely on our legitimate interests to use your personal information) provided we do not have any continuing lawful reason to continue to use and process the information. When we do rely on our legitimate interests to use your personal information for direct marketing, we will always comply with your right to object;
5. Erase your information (or restrict the use of it), provided we do not have any continuing lawful reason to continue to use and process that information;
6. Transfer your information in a structured data file (in a commonly used and machine-readable format), where we rely on your consent to use and process your personal information or need to process it in connection with your contract.

**Issued by Volkswagen Mobility Solutions Rwanda, 01.10.2023**

**Contact information**

If you have any concerns regarding our privacy policy or the use of your information, please contact us at [info@officer@vwsa.co.za](mailto:info@officer@vwsa.co.za)