

# Veo Privacy Policy

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This Privacy Policy (“Privacy Policy”) was developed as an extension of the commitment made by VeoRide, Inc., a Delaware corporation (“Veo”) to combine quality products and services with integrity in dealing with its customers (“You” or “Your”) accessing or using Veo’s websites and/or mobile applications. This Privacy Policy applies to the Veo Terms of Service, found at [www.veoride.com/terms](http://www.veoride.com/terms), and Your access and use of all Services. Capitalized terms not defined herein shall have the meanings stated in the Veo Terms of Service.

This Privacy Policy explains how Veo collects, uses, and safeguards the information You provide to Veo and assists You in making informed decisions when using the Services.

**1. CHANNELS VEO COLLECTS INFORMATION FROM.** Veo collects information from You via its mobile application, websites, issue-reporting submissions submitted by You to Veo, emails sent by You to Veo, Your social media accounts, any job applications submitted directly or indirectly by You, and any information provided by You in any phone or other communication with Veo.

**2. WHAT INFORMATION VEO COLLECTS.** Via the above channels, Veo may collect the following information from You:

2.1. “Personal Information” such as Your name, e-mail address, telephone number, postal address, credit card information, billing and contact information, demographic information, and location information; and

2.2. “Non-Personal Information” of a nature that does not personally identify You, including Your manner of access and use of Veo’s Services.

**3. WHEN AND HOW VEO COLLECTS INFORMATION.** You may provide Veo or its agents with information in several ways, including, for example, when You: register for an account, create a user profile, or provide payment information; manage Your account; use one of Veo’s Services; register for an event sponsored by Veo; authorize Veo to collect Your social media information; upload content via Veo’s Services; sign up to receive alerts or other information via email, text or instant message from Veo; ask for customer service, support or other assistance; participate in communities or other forums, or comment on blog entries; interact with Veo in any other way, including through one of its Services; or submit an application to work at Veo.

3.1. Location Information. With Your consent, Veo collects information about Your location from its Services. For example, while You are renting a Vehicle, Veo may collect information about the location of the Vehicle, the routes taken by the Vehicle, and the rental status of the Vehicle. Veo also collect information about Your location that You provide or enable Veo to collect through the Services. Veo also collects Your device’s source IP address, which may disclose the location of Your device at the time You access the Services. While You can always decide not to share information about Your location with Veo, You must agree to provide certain types of location information, including, for example, the location of any Vehicle while You are renting it, if You want to use certain aspects of the Services.

3.2. Personal Information from or Through Social Media Platforms. When You interact with any page or account on a social media platform, such as Facebook, Twitter, Google+, Tumblr, LinkedIn, YouTube, or Pinterest, Veo may collect the Personal Information that You make available on that page or account, including Your account ID or “handle” and that the social media platform permits Veo to collect, in compliance with their privacy policy. If You publish Your social media profile on the Services, Veo may collect Personal Information that You make available as part of that profile.

3.3. Personal Information from Other Sources. Veo may also collect Personal Information from other sources or from offline interactions to, among other things, verify and update information contained in Veo’s records and to better customize the Services for You. Veo may also collect Personal Information about You from credit reporting agencies to, for example, determine Your creditworthiness, credit score, and credit usage.

3.4. Personal Information from Surveys or Promotions. From time to time, Veo may provide You with the opportunity to participate in surveys or promotions, some of which might be sponsored or conducted by a third party. Participation in these surveys and promotions are completely voluntary. If You choose to participate, Veo will request certain Personal Information from You. If there is a third-party sponsor involved in the survey or promotion, please make sure to review the sponsor’s privacy notice.

3.5. Personal Information about Third Parties We Collect Using the Tell-A-Friend Feature. Veo may from time to time conduct a referral service to introduce people You know to the Services. If You choose to use such referral service to tell someone about the Services or any promotion thereof, Veo may ask You for Your contact’s name, phone number or email address. Veo will automatically send Your contact a one-time email or text message inviting him or her to access and/or use the Services. Veo will store this information for the purpose of sending this one-time email and tracking the success of the referral program. Your contact may contact Veo to request that this information be removed from Veo’s database.

3.6. Personal Information We Collect Using Cookies and Other Tracking Technologies. Like many websites and mobile applications, Veo may use “cookies”, which are small text files that are stored on Your computer or equipment when You visit certain online pages that record Your preferences and actions. Veo may also use cookies to monitor traffic, improve the Services, and make it easier and/or relevant for Your use. Like many apps and websites, Veo may use cookies, web beacons and similar technologies to record Your preferences, track the use of the Services and Your interaction with advertisements, monitor traffic, improve the Services, and make it easier, and more relevant, for You. Veo may also use cookies to: find Your account information when You access the Services (a cookie is created when You register for an Account); determine the browser You are using so the Services work properly; assist with sending You e-mail newsletters; generate analytics regarding Your use of Services; and estimate Veo’s audience size by determining whether Your visit is Your first.

Veo may use both “session” cookies and “persistent” cookies, but does not currently use flash cookies, web storage, web beacons or other technologies that track Your browsing history across multiple applications or websites.

Veo may also use Google Analytics, a web analytics service provided by Google, Inc. (“Google”), on the Services. Google Analytics uses cookies or other tracking technologies to help analyze how users interact with and use the Services, compile reports on the related activities, and provide

other services related to Your 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 application. The Services do not use Google Analytics to gather information that personally identifies You. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's privacy policies.

Veo may partner with third party advertising companies to better provide advertisements about its goods and services that may be of interest to You. These third-party advertisers may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about You when You use the websites or applications. They may collect information about Your online activities over time and across different websites, applications, or other online services. They may use this information to provide You with interest-based advertising or other targeted content. These online advertising partners do not have access to, or the ability to use and Personal Information from Veo without Your consent. They may, however, use persistent identifiers to anonymously track Your Internet usage across other websites and applications over which Veo has no control. Although Veo restricts their further use of any Personal Information they might receive from it, they may, with sufficient data from other sources, be able to personally identify You, without Veo knowing or having the ability to control.

Third-party ad serving companies and other unaffiliated advertisers also display advertisements on via the Services. As part of their service, they may place a separate cookie on Your computer or utilize other data collection and tracking technologies, to collect information such as Your IP address, browser type, the server Your computer is logged onto, the area code and zip code associated with Your server, and whether You responded to a particular advertisement. For a listing of the third party companies Veo may allow to place cookies to serve ads on the Services, click [here](#). Veo does not control these third parties' tracking technologies, how they may be used, or the information they may collect, and Veo is not responsible for the privacy policies or the content of those third parties. Please visit the sites of those businesses at the links above to review their privacy policies. Veo may add or change the list of third party ad servers from time to time and encourages You to regularly check this section for changes. You can learn more about online advertising at [www.aboutads.info/consumers](http://www.aboutads.info/consumers).

Many of the third-party advertisers that place tracking tools on or through the Services are members of programs that offer You additional choices regarding the collection and use of Your information. You can learn more about the options available to limit the collection and use of Your information by these third parties by visiting the applications for the Network Advertising Initiative and the Digital Advertising Alliance, as well as the webpages for Facebook's ad preferences tool and privacy policy. You can also 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, or Android, see:

Apple: <http://support.apple.com/kb/HT4228>

Android: <http://www.google.com/policies/technologies/ads/>

Please note that opting-out of advertising networks services does not mean that You will not receive advertising while using the Services or on other applications, nor will it prevent the receipt of interest-based advertising from third parties that do not participate in these programs. It will, however, exclude You from interest-based advertising conducted through participating networks,

as provided by their policies and choice mechanisms. Your browser or device may include “Do Not Track” functionality. Because a “Do Not Track” compliance protocol has not yet been finalized, Veo’s information collection and disclosure practices, and the choices provided to You, will continue to operate as described in this Privacy Policy, whether or not a Do Not Track signal is received. If You delete Your cookies or if You set Your browser or device to decline these technologies, some functions of the Services may not function at all, or may not function as designed.

**3.7. Consolidating Your Personal Information.** Veo may use the information from one portion of one of the Services for other portions thereof, and may combine Personal Information gathered from multiple sources, including Personal Information collected off-line or receive from third-party sources to enhance, expand, and check the accuracy of Your customer records, into a single customer record or analysis or report. Veo follows this Privacy Policy with respect to all of Your Personal Information regardless of how it was collected.

**3.8. Non-Personal Information Collected.** Veo and third party vendors may collect information about Your computer hardware and software, such as browser information, access times, the date and time of visits, the website pages viewed, time spent at Veo’s website, websites that You visited just before and just after Your visit to Veo’s website, riding time on a Vehicle, length of Vehicle operation, speed while operating a Vehicle, and certain other information collected through cookies, pixel tags, mobile applications, and other technologies.

**4. HOW VEO USES PERSONAL INFORMATION.** Veo may use Your Personal Information, including information about Your location, to: provide Services to You at Your request; track the Vehicles; upload Your content to the Services at Your request; permit You to update, edit, and manage Your content on the Services; communicate with You about Your account or transactions with Veo (including service related announcements) and send You information about features and enhancements of the Services; communicate with You about changes to Veo policies; communicate with You about Your comments to a blog post; personalize content and experiences on the Services, including providing You with reports, recommendations and feedback based on Your preferences; optimize or improve the Services; automatically update Veo applications on Your device; detect, investigate, and prevent activities that may violate Veo’s policies or be illegal; and perform statistical, demographic, and marketing analyses of users of the Services.

**5. VEO’S LEGAL BASIS FOR USING YOUR PERSONAL INFORMATION.** There are a number of bases in data protection law that permit Veo to use Your Personal Information for the purposes described in this Privacy Policy, including that: You have provided Your consent to use Your Personal Information for that purpose, including, for example, where You have given Your consent to send You electronic marketing; Veo needs to use Your Personal Information in order to fulfill its terms of service in order to provide the Services to You; Veo needs to comply with a legal obligation, including, for example, responding to government or law enforcement information requests; and/or the processing is necessary for the purposes of Veo’s legitimate interests, provided such use is balanced against Your rights and interests.

Veo’s legitimate interests to use Your Personal Information include: to ensure effective administration and management of Your relationship with Veo, including any Vehicle rentals; to understand how Veo’s customers use the Services and to manage its Vehicle fleet; to carry out research and analysis on what services or products Veo’s customers want or otherwise to improve the Services; to understand how Veo’s customers use the Services, and identify any issues in how the Services are used and how it can improve the customers usage experience; to tell customers

about the various Services Veo offers; to understand and respond to customer feedback; to better tailor and personalize the Services; to prevent, detect, or investigate unauthorized use of the Services or Vehicles, and ensure compliance with Veo's policies; to manage any disputes and accidents and take legal or other professional advice.

**6. WHO VEO PROVIDES YOUR PERSONAL INFORMATION TO.** Except as disclosed in this Privacy Policy, Veo does not disclose Your Personal Information collected online to any company not an affiliate, subsidiary or related entity to Veo. In no event will Veo sell or rent Your Personal Information as part of a customer list or similar transaction. Veo may use and share Your Personal Information with affiliated and non-affiliated organizations as follows:

6.1. With credit card issuers and financial institutions in order to obtain payment from You, such that they may process payments and refunds, verify the absence of fraud, or assist in debt collection, in the course of the performance of a contract or on the basis of other legitimate interests.

6.2. With IT services providers (including IT platform providers and website analytic service providers) in order to provide the Services to You and to analyze Your use of the Services, such that they may support Veo's IT systems, provide hosting, processing and analyzing services with respect to information and data collected, and provide maintenance of such systems, in the course of the performance of a contract or on the basis of other legitimate interests.

6.3. With our agents and other service providers, in order for the same to perform function on Veo's behalf, such as hosting, billing, notification, storage, content management, analytics, customer service, fraud protection, etc., in the course of the performance of a contract, on the basis of other legitimate interests, by legal obligation, or through your consent.

6.4. With government, regulatory, or law enforcement agencies, in order to verify Your identity and licensing, as requested by those agencies where disclosure is required or permitted by law, to take action with respect to illegal conduct or conduct in violation of Veo's policies or to address an emergency situation (including instances where Veo reasonably determines such to exist or be likely to exist), on the basis of legitimate interests or legal obligations.

Veo may also transfer or assign Your Personal Information to third parties as a result of, or in connection with, a sale, merger, consolidation, change in control, transfer of assets, bankruptcy, reorganization, or liquidation. If Veo is involved in defending a legal claim, it may disclose information about You that is relevant to the claim to third parties as a result of, or in connection with, the associated legal proceedings.

Veo may also use or disclose Personal 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 Veo, (b) protect and defend its rights or property, the Services, or other customers, and (c) act under emergency circumstances to protect the personal safety of Veo's employees, affiliates, agents, or customers. This includes exchanging information with other companies and organizations for fraud protection.

**7. HOW VEO USES YOUR NON-PERSONAL INFORMATION.** Veo may use Non-Personal Information collected from You through the Services to optimize or improve the Services, to perform

statistical, demographic, and marketing analyses of users of the Services, and for such other purposes as it may deem necessary or beneficial to it from time to time.

**8. HOW LONG VEO STORES YOUR PERSONAL INFORMATION.** Veo keeps Your Personal Information only so long as it determines is necessary to provide You the Services, enforce terms of any agreement between Veo and You or any other party (including following any termination thereof for audit or archival purposes), or as required by law. Factors that may influence the duration include the duration of Your Account, Your frequency of use of the Services, third party contractual obligation to retain any information, and any ongoing or potential legal claims in connection with Your use of the Services.

**9. SECURITY MEASURES TAKEN BY VEO TO PROTECT YOUR INFORMATION.** Veo uses reasonable organizational, technical, and administrative measures to protect Your Limited Personal Information from unauthorized access or disclosure, accidental loss, or destruction. However, no method of transmission over the Internet and no method of electronic storage is one hundred percent secure. Veo strives to use commercially acceptable means to protect Your personal information, but cannot guarantee its absolute security. Communications You may have with Veo via the Services or email may not be secure unless Veo advises You that security measures are in place prior to Your sending information. Therefore, if You choose to communicate with Veo through these means, You are assuming the risk of doing so and Veo requests that You do not send or post sensitive information through these means.

**10. AGE REQUIREMENT.** The Services are not directed at minors. You must be at least 18 years of age to use, access, or register for the Services or to submit personally identifying information to Veo via any of its Services. By using the Services, You are representing that You are at least 18 years old. If You are under the age of 18, then You must obtain permission from a parent or legal guardian before submitting information to Veo via the Services, in accordance with the Terms of Service. Additionally, if Veo obtains actual knowledge that You are under the age of 13, Veo will take reasonable steps to remove Your Personal Information and Passive Information (both defined below) from Veo's databases.

**11. YOUR OPT-OUT AND INFORMATION ACCESS RIGHTS.** If at any time You do not wish to receive the communications stated herein from Veo, You may "opt-out" by writing to VeoRide, Inc., 1334 3rd Street Promenade, Ste 300, Santa Monica, CA 90041 or by emailing [hello@veoride.com](mailto:hello@veoride.com). It may take up to 15 days for the change to be fully effective.

**12. CALIFORNIA CONSUMER PRIVACY ACT.** The following provisions apply to You if You are a California resident or use Veo's services in California.

12.1 You have the right to request that Veo disclose to You (i) the categories and specific pieces of personal information that Veo has collected about You; (ii) the categories of sources from which the personal information was collected; (iii) the business or commercial purpose for collecting such data; and (iv) if any, the categories of third parties with whom Veo has shared personal information.

12.2 You have the right to request that Veo delete any personal information about You which we have collected from You, unless that information is necessary for Veo to retain pursuant to Cal. Civ. Code § 1798.105(d), which for instance, allows retention of such information for completing the transaction for which the personal information was collected, detecting security incidents, or complying with a legal obligation.

12.3 Veo will not discriminate against You for exercising Your rights set forth in this Section in violation of Cal. Civ. Code § 1798.125.

12.4 To submit requests for information or deletion pursuant to this Section 12, You may reach out via email to [hello@veoride.com](mailto:hello@veoride.com). We will endeavor to disclose and deliver requested information to You without charge within 45 days of receiving Your request, and if an extension of such timeframe is reasonably necessary, we will provide you notice of such extension. Veo is not required to provide such information more than twice in a 12-month period. Only You, or someone legally authorized to act on Your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. Veo cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to You.

12.5 Veo has collected certain information from the following categories of "Personal Information," as set forth in CA Code 1798.140(o)(1), from its users in the past 12 months: (i) identifiers, such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers; (ii) internet or other similar network activity information, including, but not limited to, as browsing history, search history, information on a consumer's interaction with a website, application, or advertisement; (iii) geolocation data; and (iv) inferences drawn from other personal information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

**13. CHANGE IN VEO'S BUSINESS OWNERSHIP OR STRUCTURE.** If Veo is subject to a change in control, including by way of an equity transfer or acquisition or a sale of all or substantially all of its assets, or Veo undertakes a corporate reorganization (including a merger or consolidation) or any other action or transfer between entities, You expressly consent to Veo transferring Your information to the new owner or successor entity so that the successor in interest or acquirer can continue providing Services.

**14. PRIVACY POLICY CHANGES.** This Privacy Policy may be updated from time to time. Please review it periodically as Your use of the Services constitutes Your agreement to this Privacy Policy as amended. Changes to the Privacy Policy will become effective when posted online.

For questions or suggestions regarding this Privacy Policy, please contact Veo at [hello@veoride.com](mailto:hello@veoride.com).