

Privacy policy for Passenger One

As a user of one of our services, you entrust us with your personal information in various ways described below. It is important to us that you feel comfortable with the information you provide and that you know that your privacy is a priority to us. Below we endeavor to be transparent by describing how we gather and use personal data. We provide you with information about how we store your personal data, who has access to it and your rights according to GDPR* and other regulations concerning personal data (**Regulation 2016/679 of the European Parliament and of the council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)*).

Passenger One is the Data Controller for the following categories of personal data:

- Administration of passengers
- Payments from passengers
- Administration of drivers
- Payments to drivers
- Review of passengers and drivers
- Information used to match passengers and drivers
- Direct marketing
- Support
- Development
- And additional processing to fulfil applicable legal obligations

These categories of personal data can apply to passengers, drivers or both.

Please see our detailed description below, to help us inform you of the specific processing activities we may perform on your personal data, when you use one or more of our services.

1. Types of data we process

1.1 Data processing which only applies to passengers

1.1.1 Administration of passengers

| Purpose | Data processing | Personal data we process |
|--|--|--|
| Identification, providing you with a personalized membership with us, tailoring the service offerings to your preferences, and contacting you about important matters relating to our provided services (for example issues relating to the security, operation and availability of our service) | <ul style="list-style-type: none"> • Verifying your identity • Creation of a personal account and user authentication for logging in to our services • We use your Swedish Personal Number to verify the information through Bisnode (a private registry that collects the information from the Swedish Tax Agency) • Storing and handling membership details (your user profile, personal choices and preferences) • Adding you to an e-mail list and e-mailing you about important matters relating to the provided service | <ul style="list-style-type: none"> • Full name • Swedish Personal Number • Email • Phone number • Profile picture |
| <p>Legal ground: Performance of the membership contract according to article 6.1 b) in the GDPR. When you sign up as a passenger you enter into a membership contract with us. We need to process the categories of personal data above to provide the service to you.</p> | | |
| <p>Retention period: Until your membership contract ends. To end your membership contract please contact our support.</p> | | |

1.1.2 Payments from passengers

| Purpose | Data processing | Personal data we process |
|--------------------|---|--|
| Handle and process | <ul style="list-style-type: none"> • When you sign up as a passenger, a personal account is registered for | <ul style="list-style-type: none"> • Name |

| | | |
|---|---|--|
| <p>payments when you are a passenger as well as collecting information about your location to prevent fraud</p> | <p>you with our payment provider Stripe. This Stripe account is linked to your Passenger account</p> <ul style="list-style-type: none"> To assist in Stripe’s fraud monitoring, prevention and detection activities, we may also send them Personal Data about you, as necessary to confirm your identity and prevent fraud Stripe does not share your credit card details with us. For more information about how Stripe processes your personal data, please visit https://stripe.com/en-se/privacy | <ul style="list-style-type: none"> Payment verification and history |
| <p>Legal ground: The proper performance of the contracts with you (Membership contract and each trip) according to article 6.1 b) in the GDPR as well as fulfilling the obligations of the Swedish book-keeping legislation (legal obligation according to article 6.1 c) in the GDPR).</p> | | |
| <p>Retention period: 7 years after the payment due to Swedish book-keeping legislation.</p> | | |
| <p>More information: We use Stripe as a third party that processes payments. Stripe does not share your credit card details with us. For more information about how Stripe processes your personal data, please visit https://stripe.com/en-se/privacy.</p> | | |

1.2 Data processing that only applies to drivers

1.2.1 Administration of drivers

| Purpose | Data processing | Personal data we process |
|--|--|--|
| <p>Identification of you and verifying that you have a valid driver’s license,</p> | <ul style="list-style-type: none"> Verifying your identity through your driver’s license Storing and handling membership details (your user profile, personal choices and preferences) | <ul style="list-style-type: none"> Full name Swedish Personal Number Address Email |

| | | |
|---|--|---|
| <p>providing you with a personalized membership with us, tailoring the service offerings to your preferences, and contacting you about important matters relating to our provided services (for example issues relating to the security, operation and availability of our service) when you sign up as a driver. Information about your car is collected to better match you with the right passengers</p> | <ul style="list-style-type: none"> • Creation of a personal account and user authentication for logging in to our services • We use your Swedish Personal Number to verify the information through Bisnode (a private registry that collects the information from the Swedish Tax Agency) • We use the license plate number of your car to collect additional information about your car (manufacturer, car model and color) from Biluppgifter, a private registry provided by the company Jump Forward AB • Linking your car to your profile • Adding you to an e-mail list and e-mailing you about important matters relating to the provided service | <ul style="list-style-type: none"> • Phone number • Profile picture • A photo of your driver's license • License plate number of your car • Car manufacturer • Car model • Car color |
| <p>Legal ground: Performance of the membership contract according to article 6.1 b) in the GDPR. When you sign up as a driver you enter into a membership contract with us. We need to process the categories of personal data above to provide the service to you.</p> | | |
| <p>Retention period: Until your membership contract ends. To end your membership contract please contact our support.</p> | | |

1.2.2 Payments to drivers

| Purpose | Data processing | Personal data we process |
|--|---|--|
| Handle and process pay-outs if you are a driver | <ul style="list-style-type: none"> • When you sign up as a driver, a personal account is registered for you with our payment provider Stripe. This Stripe account is linked to your Passenger account • We provide Stripe with your name, date of birth, address email, phone number and photo of your driver's license • Stripe does not share your bank account details with us. For more information about how Stripe processes your personal data, please visit https://stripe.com/en-se/privacy • Information about your location is being processed and sent to Stripe to help them prevent fraud | <ul style="list-style-type: none"> • Name • Date of birth • Address • Email • Phone number • Photo of your driver's license • Your location • Payment verification and history |
| <p>Legal grounds: The proper performance of the contracts with you (Membership contract and each trip) according to article 6.1 b) in the GDPR as well as fulfilling the obligations of the Swedish book-keeping legislation (legal obligation according to article 6.1 c) in the GDPR).</p> | | |
| <p>Retention period: 7 years after the payment if Swedish book-keeping legislation require it. Otherwise five years for security purposes.</p> | | |
| <p>More information: We use Stripe as a third party for processing payments. Stripe does not share your bank account details with us. For more information about how Stripe process your personal data, please visit https://stripe.com/en-se/privacy.</p> | | |

1.3 Data processing that apply to both passengers and drivers

1.3.1 Review of passengers and drivers

| Purpose | Data processing | Personal data we process |
|--|---|---|
| <p>Create and maintain a review system to build a safe community</p> | <ul style="list-style-type: none"> • After each trip drivers are asked to give their passengers a rating and an optional comment • Each user gets an automatically calculated average rating based on the stars that they have received • When our system matches a driver with passengers, they will be able to see each other’s latest three comments and stars that they have received from other users | <ul style="list-style-type: none"> • Rating consisting of 1-5 stars • Average rating score based on the above • Optional comment |
| <p>Legal ground: Legitimate interest according to article 6.1 f) in the GDPR. The processing is necessary to pursue our and our user’s legitimate interest in creating a respectful and safe traveling environment. In our pursuit of building a safe community with a positive atmosphere we have a feedback system to establish accountability among our users promoting them to treat each other with respect and dignity.</p> | | |
| <p>Retention period: Reviews are saved during the time you have an account. They are deleted when you terminate your account.</p> | | |
| <p>More information: We require that you are respectful when giving comments to others as this information will be made available to other users whenever that person is going to make a trip in the future.</p> <p>If you feel that you have received unfair, abusive or discriminatory feedback from another user, you can always contact our support who will deal with the situation.</p> | | |

1.3.2 Matching passengers and drivers

| Purpose | Data processing | Personal data we process |
|--|---|--|
| <p>Providing a digital platform that matches drivers and passengers travelling to destinations close to each other. This makes carpooling possible. After the ride we will store the details of the trip for security reasons and for proof of provided services</p> | <ul style="list-style-type: none"> • Storage and analysis of passenger and drivers GPS-position and their entered destination to find the best match • Present suitable passengers for the trip to the driver, who will see the prospective passengers name, profile picture, current position, destination, average rating as well as the stars and comments that the passenger has received from the last three users • If the passenger is female and has asked to only be matched with female drivers, the Swedish Personal Number will provide that information for us and be used for the match • The driver must accept the passenger for the matching process to continue • When the driver accepts the passenger, the driver and car are presented to the passenger. Personal data about the driver: Name, profile picture, car manufacturer, car model, car color, car registration number, current GPS-position as well as the drivers average rating, stars and comments | <ul style="list-style-type: none"> • Name • GPS-position (when a new trip is created) • Realtime GPS-position • Destination of the trip • Three latest ratings received by other users • Three latest comments received by other users • Profile picture • Car color • Car registration number • Swedish Personal Number |

| | | |
|--|--|--|
| | that the driver has received from the three latest users | |
| Legal ground: The proper performance of a contract with you according to article 6.1 b) in the GDPR, since this information is necessary in order to match a driver to a passenger. | | |
| Retention period: The information about the trips are stored during the time the person has an account. | | |
| More information: When the driver and passenger open the app and create a trip, we collect their current GPS-position as well as the desired destination that each party has entered. Based on the GPS-positions and desired destination our system matches the passenger with a suitable driver. | | |
| Drivers and passengers can see each other's GPS-location in real-time so that they can find each other at the meeting point. After the ride we will store the details of the trip and enable you to view them in the history section. | | |

1.3.3 Direct marketing

| Purpose | Data processing | Personal data we process |
|---|--|---|
| Promoting the use of our services | <ul style="list-style-type: none"> When you sign up as a user you are added to our list, that is used for the promotion of our services via mail. <p>We use this mailing list to inform you about new features that we have added, tips on how you can use the app in new and smarter ways, new partnerships or to promote other similar services that we offer</p> | <ul style="list-style-type: none"> Email Name Physical address |
| Legal ground: Legitimate interest according to article 6.1 f) in the GDPR. We use this mailing list to pursue our legitimate interest of direct marketing this service and other similar services or products that we offer. You can opt-out from this mailing list free of charge at any time by clicking the unsubscribe link in the emails you receive, you can opt in again by contacting our support. | | |

Retention period: One year after the membership contract has ended or until you chose to opt out.

1.3.4 Book-keeping and other legal obligations

| Purpose | Data processing's | Personal data we process |
|---|---|--|
| To comply with legal obligations | <ul style="list-style-type: none"> • Bookkeeping of transactions • Data processing that is necessary in order to comply with legal obligations that arises from a law or a decision made by a court or a public authority | <ul style="list-style-type: none"> • Name • Swedish Personal Number • Transaction information |
| <p>Legal ground: Legal obligation according to article 6.1 c) in the GDPR. This processing is necessary to comply with existing legislation. If we do not retain this information or if you do not provide it to us when it is necessary, we will not be able to comply with our legal obligation. In that case we might have to stop providing you with our services.</p> | | |
| <p>Retention period: Book-keeping information is stored for 7 years in accordance with Swedish book-keeping laws. In other cases, data is stored when it is required by a legal obligation.</p> | | |

1.3.5 Support

| Purpose | Data processing's | Personal data we process |
|--|---|--|
| Providing customer service and handling cases and complaints | <ul style="list-style-type: none"> • Identification • Communication and handling of support questions (by phone, email, social media and other digital media) • Investigation and support. For example <ul style="list-style-type: none"> ○ If there is an issue with your account ○ To handle complaints from you or other users | <ul style="list-style-type: none"> • Name • Swedish Personal Number • Contact details • Information that is provided by a customer or questioner in a case (for example in writing or over the phone) • Information about a certain trip, including the |

| | | |
|--|---|---|
| | <ul style="list-style-type: none">○ To prevent or investigate fraud or similar○ To provide support to you or other users○ To resolve cases and issues | drivers, passengers on the trip as well as GPS data |
| Legal ground: Legitimate interest according to article 6.1 f) in the GDPR. The data is processed pursuing our legitimate interest in providing support to our users, handling complaints and issues and to ensure that we have the necessary documentation for legal reasons. | | |
| Retention period: Until the case issue has been resolved and as long it is necessary to establish, exercise or defend legal claims (generally 10 years). | | |

2. Sharing of your data and international transfers of personal data

In this section we describe who we share your personal data with. We share your data with companies who process your personal data on our behalf, which are called data processors. We make sure to always have a Data Protection Agreement with the data processors we use. Sometimes we also share your personal data with third parties who use the data for their own purposes, these are other data controllers.

Some of the data controllers and processors transfer your data outside the European Union (EU) or the European Economic Area (EEA). Whenever your personal data is transferred outside of the EU or EEA we ensure that your personal data is subject to an adequate level of protection.

An adequate level of protection for your personal data can be acquired if the data processor or data controller is certified under the [EU-US Privacy Shield Framework](#) for transfers of personal data to the United States of America or if we sign a contract with the provider that [contains model contractual clauses that have been adopted by the European commission](#).

Who do we transfer data to?

a) *TYPEFORM*

When you use the sign-up forms on our website to become driver or a passenger, your personal data is handled by TYPEFORM S.L. TYPEFORM is a Spanish company.

b) Googles Cloud

The heart of our system resides in Googles Cloud. We employ Google, through its subsidiary Google Ireland Limited, as a data processor. The data stored on Google's servers are used to run our website and the functions of the app. Your data might be transferred outside the EEA, mainly to the US, using either model contractual clauses or under the [Privacy shield certification of Google inc. and its subsidiaries.](#)

c) Stripe

Our payment processor is Stripe, a US-based company. Please note that Stripe is an independent financial institution. As such Stripe uses the personal data it receives from or through us for their own purposes as well. Stripe does this to for example monitor, detect and prevent fraudulent transactions and to comply with legal requirements like anti-money laundering screening and to improve their services.

We have an agreement with their subsidiary registered in Ireland: Stripe Payments Europe, Ltd. In order to process your personal data, Stripe may transfer your personal data outside the EEA. In most cases your personal data will be transferred to the United States of America. [Stripe transfers personal data to the US under its Privacy Shield certification.](#) In case Stripe would transfer your personal data to another country outside the EEA our contract with them requires them to implement necessary safeguards.

d) Mixpanel inc.

For the purposes of improving the app we have contracted Mixpanel inc. who is a US-based company as a data processor. On our behalf they collect information about how our users are using the app and other information that we use to investigate why the app crashes or is malfunctioning. This information is sent to them directly from the app. This information includes some personal data like your name, information about your mobile device and how you use it. Data that is sent to Mixpanel is transferred to the United States of America. [Mixpanel is certified under the Privacy Shield Framework.](#)

e) The Rocket Science Group LLC – Mailchimp

For the administration of our mailing lists and sending of emails/newsletters to recipients on the mailing lists we have contracted The Rocket Science Group LLC d/b/a Mailchimp, we will refer to them as Mailchimp. Mailchimp is a US-based company.

When you sign up to our services you are added to our mailings list and your email and name are sent to Mailchimp and this personal data is transferred to the United States of America. [Mailchimp is certified under the Privacy Shield Framework.](#)

3. Your rights

The data subject has certain rights that may be good to be aware of.

3.1 Right to get information

As a data subject, you have a right to be informed about the processing of your personal data. The information that shall be given is e.g. contact details to the data controller, the purpose and legal ground for a specific processing and if the personal data is being transferred to a third country, what appropriate safeguards have been taken to protect the personal data. The information you have a right to receive follows from this privacy policy.

3.2 Right of access

You have a right to obtain a copy of all the personal information that we hold regarding you to control that we are processing your personal data in a fair manner. You have a right to a transparent processing.

3.3 Right to data portability

You have a right to request that we provide you with a copy of the personal data that we have collected from you and that we deliver it in a structured and widely used machine readable format.

3.4 Right to erasure

You have a right to request erasure of your personal data in the following cases:

- If the personal data is no longer necessary in relation to the purposes for which they were collected.
- If you withdraw your consent on which the processing is based
- If the personal data have been unlawfully processed
- If the personal data must be erased for compliance with a legal obligation

In some situations, Passenger One has a right to refuse erasure. These situations include:

- If there is a legal obligation to continue processing the personal data.
- If we need to carry out a task in the public interest.

- If we need to determine, claim or defend legal obligations.

3.5 Right to rectification

You have a right to request correction of any inaccurate personal data.

3.6 Right to restriction of processing

You have a right to Request that we restrict our processing of your personal data if you contest the accuracy of the personal data, if the processing is unlawful, if Passenger One no longer needs the personal data or if the processing is based on our legitimate interest.

3.7 Right to object

You have a right to object to our processing of personal data, if the processing is based on legitimate interest.

3.8 Consent

Any processing based on your consent must stop if the consent is withdrawn. You have the right to withdraw your consent when you want to.

4. Complaints to data protection authorities

You always have the right to file a complaint to the Swedish Data Protection Authority, Datainspektionen. You can call them at +46 (0)8 - 657 61 00 or email to datainspektionen@datainspektionen.se . Their website is <https://www.datainspektionen.se/other-lang/in-english/>

If you live or work in another EU-country, you always have the right to file your complaint with the data protection authority in your own country instead.

5. Contact information to Passenger One

If you have any questions about this policy or if you want to use one of your rights, do not hesitate to contact us:

Passenger One AB

Org.nr. 559093-7446

info@passenger.se