



# Privacy Statement

Because DOCKR B.V. believes it is essential to protect personal data, we process your data with the utmost care. This privacy statement sets out how we deal with your personal data.

## **Who is responsible for processing your data?**

In this privacy statement, DOCKR B.V. ('DOCKR' or 'we') describes how it deals with your personal data as the controller when you use our services, such as a subscription for using our vehicles or this website.

## **What constitutes an item of personal data?**

Information about an identified or identifiable natural person is an item of personal data. Whether certain information must be classified as an item of personal data partly depends on whether DOCKR has lawful means at its disposal from which it may reasonably be assumed that it uses these means to identify a data subject.

## **Which personal data do we process?**

We process your personal data because you provide these data to us when entering into an agreement with us, or when you use this website.

### ***A) Data generated by your use of our services and/or this website***

If you use DOCKR services, such as a subscription to use a vehicle, or have some other form of contact with us, we process the following personal and other data for the purpose of our services depending on the exact service you use:

- Data required to facilitate renting a vehicle, such as your contact details, name and address
- Data required for financial administration, such as your bank account number, name and address
- Your communication preferences and settings
- Browsing behaviour, based on our own observations or cookies (also see Article 9 of this privacy statement)
- Data relating to your peripherals, such as a MAC address, IP address or other number
- Data about your use of our customer service.



### ***B) Data processed through the GPS Tracker in the DOCKR vehicles***

Each vehicle issued by DOCKR is equipped with a GPS Tracker. If you take out a DOCKR subscription, we may process the vehicle's location data in exceptional cases to find lost or stolen vehicles or to recover vehicles in default of payment. Processing these data is necessary to provide our services. DOCKR has chosen to install the GPS Tracker in the vehicles because of how much it costs to replace them. This enables DOCKR to offer you its vehicles at the best possible price.

The GPS Tracker is activated as soon as you declare – through DOCKR customer service – that your vehicle has been lost or stolen. As the Tracker is only activated then to establish the vehicle's location, location data are not collected continuously.

The vehicle's location is registered by saving the coordinates. These coordinates are used only for calculating the vehicle's location to be able to find it. Once the vehicle has been found, location processing is stopped immediately and the processed data are deleted.

### **Processing: bases and legitimate interests**

Personal data are processed on the following legal bases:

- Consent
- Performing an agreement with you
- Legal obligation
- Performing a task carried out in the public interest
- Legitimate interest of DOCKR or a third party.

Legitimate interests include security, crime and other forms of prevention, IT management, research and analysis into the company's products or services, business administration, legal affairs and internal management.

### **Purposes of processing personal data**

We process your personal data carefully. We use only data that are necessary for our services. DOCKR processes your personal data for the purposes listed below. The number after each purpose corresponds to the basis mentioned in Article 4 of this privacy statement.

### ***A) Purposes for providing our services***

- Issuing, receiving and interim maintenance of the vehicle [basis: 2]
- Keeping DOCKR's records for financial and tax obligations, including collective or separate invoicing for our services [basis: 2 or 3]
- The lost-and-found process for stolen or lost vehicles and for default of payment through tracking [basis: 2]
- Communicating with and informing you, and providing service (e.g. through customer service) [basis: 2 or 5]
- Providing services, such as maintenance, repairs and/or replacement of the vehicle [basis: 2].



## **B) General purposes**

- Building and maintaining customer relationships [basis: 2]
- Providing customer service, including in relation to purchasing services and handling complaints and requests [basis: 2]
- Processing personal data into management information [basis: 2]
- Conducting market research, including measuring customer satisfaction, to improve our business operations, brands, services and products [basis: 5]
- Developing and continuing to develop and improve new and existing products and services [basis: 5]
- Complying with legal obligations, settling disputes and enforcing our rights and agreements [basis: 2, 3 or 5]
- Analysing cookies from our website. We do this to tailor the content of our communications to your personal preferences as closely as possible [basis: 1 or 5].

### **No processing of data from people younger than 16**

We do not intentionally collect data from people younger than 16. We recommend that parents be aware of their children's activities, both online and offline, to prevent DOCKR from processing their personal data.

### **Sharing with third parties**

DOCKR shares your personal data with third parties in the following cases, among others, and for the accompanying reasons. The number after each purpose corresponds to the basis mentioned in Article 4 of this privacy statement:

- If we are legally obliged or authorised to provide personal data to third parties [basis: 3]
- If we suspect a violation of third-party rights, criminal offences or abuse, we may provide personal data to third parties who have a legitimate interest in those data or to bodies that serve the public interest. These bodies can also be enforcement authorities, such as the Public Prosecution Service or supervisory authorities [basis: 3, 4 or 5]
- DOCKR may also share your data with others to perform an agreement with you, or for legitimate business interests, such as central administration or customer service, and to analyse our services to you [basis: 5]
- With parties that assist DOCKR in providing its services and are not processors (e.g. accountants and legal or other advisers) [basis: 5]
- For commercial purposes (such as sale of business activities or shares, or a reorganisation) [basis: 5].

DOCKR also uses the services of third parties who act as 'processors', such as hosting service providers. If these third parties are regarded as processors under applicable data protection legislation, DOCKR will enter into written agreements with these third parties. These service providers will process personal data only in accordance with the instructions and under the control of DOCKR.

If personal data are sent to a recipient abroad, this is usually only to a recipient in a country that the European Commission has determined offers an adequate level of protection for personal data. If personal data is sent to a recipient in a country that does not offer an adequate level of protection, DOCKR will ensure that the legally required safeguards are implemented.

If you wish to receive further information about the transfer of your personal data to countries outside the European Economic Area, you can contact DOCKR's Data Protection Officer (see Article 12).



## **Retention of your data**

We will retain personal data for as long as is necessary or permissible for the purposes described in this Privacy Statement and in accordance with applicable law. The criteria used to determine our storage period include:

- How long we have had an ongoing relationship with you and provided services to you (e.g. as long as you continue to use our services)
- Whether there is a legal obligation that we must comply with (e.g. certain laws require us to retain our transactions for a certain period before we can delete them); or
- Whether retention is advisable because of our legal position (e.g. with regard to limitation periods, disputes or investigations by regulatory bodies).

## **Analysing website visits**

If you visit our website or purchase services, we may use cookies, web beacons and other similar information-storage technologies to personalise advertising and give you a better, faster and more secure customer experience. If you do not want to use cookies, you can state this. For more details about using cookies, please refer to our cookie statement (<https://DOCKR.nl/cookies/>). You might find links to other websites on our website. We are not responsible for how these websites deal with your personal data. Consult the privacy statement of the website you visit for this purpose.

## **Your rights, including the right to object**

You have the right to know which personal data we process about you and to whom we have provided your personal data. If you have consented to the processing of your personal data, you also have the right to withdraw that consent.

If you wish to access, rectify, update, restrict or delete personal data that we have processed, object to the processing of personal data or to direct marketing, or if you wish to receive an electronic copy of your personal data to transfer it to another company (if this right to data portability is granted to you under the applicable law), please contact the Service Desk using the contact details mentioned in Article 12.

Please describe the personal data to which your request relates as clearly as possible in your request. We will respond to your request as soon as reasonably feasible and always within the time limits required by law. Lastly, you have the right to lodge a complaint with the Dutch Data Protection Authority [*Autoriteit Persoonsgegevens*].

You can exercise your rights only to the extent that the law grants you such rights. To ensure that you are the person who has made a request, we may ask you to enclose a copy of your identity document with the request. We will ask you to do this only if we deem it necessary to identify you and also ask that you block out the passport photo, MRZ (machine readable zone; the strip with numbers at the bottom of the passport), passport number and citizen service number (BSN) on this copy. We will destroy the copy of your identity document immediately after we have identified you.

## **Data security and protection**

DOCKR applies appropriate security measures to prevent misuse, loss, unauthorised access, unwanted disclosure and unauthorised changes as much as possible. DOCKR has implemented both technical and organisational measures to protect your personal data, including the use of encryption techniques. These security measures are reviewed periodically based on threats.

## **Contact**

DOCKR has its registered office in Amersfoort. If you have questions and/or comments about this privacy statement, please contact:



DOCKR B.V.  
Attn: Privacy  
Zuiderinslag 2  
3833 BP Leusden  
Email: [info@dockrmobility.nl](mailto:info@dockrmobility.nl)

**Amendments**

As the manner in which we process personal data and the composition or quantity of the data we process could change, we reserve the right to amend this privacy statement. You will be informed of any amendments, if necessary.

This statement was last revised on 16 June 2022.