

PRIVACY STATEMENT SLINGER B.V.

INTRODUCTION

Slinger B.V. ('we,' 'us,' or 'our') respects your privacy and is committed to protecting your personal data. This privacy statement describes how we handle your personal data in accordance with the General Data Protection Regulation (GDPR) and other applicable laws and regulations.

This means that we:

- **Clearly define our purposes**, before we process your personal data, through this privacy statement;
- **Store as little personal data as possible** and only the data necessary for our purposes;
- **Obtain explicit consent for processing your personal data**, should consent be required;
- **Implement necessary security measures to protect your personal data**. We also impose these obligations on parties processing personal data for us;
- **Respect your rights**, such as the right to access, correct or delete your personal data processed with us. We take appropriate measures to process your data securely and will always use these data in accordance with what we have agreed and in the manner required of us by law.

This statement applies to all users of our Platform, including drivers, passengers, (employees of) corporate clients using our platform ('Platform') made available through the websites of our corporate clients ('the Clients') and visitors to our website (slinger.to). Users of our Platform have the ability to communicate with each other by sending messages through the Platform, hereinafter referred to as 'Message Service'. In this privacy statement, we explain all the things we do with the personal data we process from you. If you have any questions or want to know exactly what we track about you, please contact Slinger BV (contact details are at the bottom of this privacy statement).

1. PERSONAL DATA COLLECTED

We collect the following categories of personal data:

Drivers: Name, contact details (such as email address and phone number), street name, house number and city name (for the purpose of the ride start point, which is randomised based on a 100-200 metre radius).

Passengers: Name, contact details (such as email address and phone number), payment details (processed through Stripe), and information about the booked rides.

Clients: Name (of employee), position, company name, business contact details (such as email address and phone number), payment details such as billing address and Chamber of Commerce number of the company, and information about cooperation with the Client.

Website visitors: Analytical visitor data, anonymised as much as possible, including the visitor's IP address and information related to website usage.

Message data: The content and metadata of messages sent and received through the Messaging Service are collected. This may include message timestamps, sender and recipient information and other related data.

Tracking data via Google Tag Manager: Our website uses Google Tag Manager to collect data on website traffic. This may include IP addresses, pages visited, interactions with the website, and other analytical data.

Information from Apollo.io: Apollo.io is used to collect business information about website visitors, which may include which companies visit our website, their approximate location and possibly other business-related information.

Contact form data: Through the contact form on our website, personal data such as name, e-mail address, telephone number and any other information provided is collected. This is data that you voluntarily provide to us.

Car data: The type of car specified by the driver, the driver's profile picture, and the number of seats available in the car are collected and shared with passenger(s).

Login data: combination of a login name or e-mail address with a password.

Portal data: We keep track of what actions you perform within our portal and when you performed them.

Spotify data: Users can choose to link their Spotify account and that this allows data such as playlists to be shared via Spotify's API.

Feedback data: After the ride, both driver and passenger receive a request to fill in a feedback form. The data collected may cover the assessment of the ride, the driver, and the passenger, as well as any comments or suggestions.

2. PURPOSES OF DATA PROCESSING

We process your personal data for the following purposes:

- **Provision of our services:** Establishing contact between drivers and passengers, facilitating rides and payments through the Platform and supporting collaboration with the Clients.
- **Subscription:** the Clients can take out a paid subscription with us to use the Platform on the Client's website.
- **Portal access:** Through our online portal, the Client gains access to a management environment where the Client can set up, specify and change things themselves, such as their contact and company details.
- **Customer support:** To help you with questions or problems and to maintain communication with you.
- **Sharing (personal) data with the Clients:** We only share your personal data with the Client on whose website you have used the Platform. This Client may only use this data to facilitate the services and may not use it for commercial purposes.
- **Communication through the Messaging Service:** The messaging data collected is processed to enable communication between drivers and passengers. This data may also be used to ensure the security of the service, prevent misuse and resolve disputes.
- **Car data sharing:** Car data (car type, profile picture, number of available seats) is processed and shared with passengers to inform them about their ride and to improve the service.
- **Spotify link:** Spotify linking is used to personalise the user experience by sharing playlists while driving. This functionality is optional and is activated only with the user's consent.
- **Portal data:** We record what actions the Client performs through the portal. This is important to detect, for example, fraud, errors or inaccuracies.
- **Feedback processing:** Feedback data is collected and processed to monitor and improve the quality of the service and to respond to complaints or suggestions if necessary.
- **Business relationship management:** To manage our business relationships with the Clients, including communication and administrative purposes.
- **Payment transactions:** Payments are processed through Stripe Connect. We do not receive direct payments and all payments are managed by Stripe.
- **Improving our services:** We may use anonymised data to analyse and improve our Platform.
- **Google Tag Manager:** Data collected via Google Tag Manager is used to analyse website traffic, improve user experience and optimise marketing and advertising campaigns.
- **Use of third-party lead generation and data enrichment services:** We use specialised lead generation, data enrichment and customer management software. This software enables us to collect public business data, such as business information, business contact details and other relevant business data. The service providers we use for these purposes may process this data on our behalf. These third parties fall under categories such as 'providers of lead generation and data enrichment services.' These service providers process personal data in accordance with applicable privacy laws and our instructions, and we ensure that they implement adequate security measures to protect the data.

- **Contact form:** Data collected through the contact form on our website is used to answer queries, process information requests and maintain further communication.
- **Sending newsletters:** We have a newsletter and you will be added to the list of subscribers only with your consent. In the newsletter, you will read news, tips and information about our products and services. We use your e-mail address for this purpose. The newsletter is sent once a quarter to the e-mail address you provide. You can unsubscribe from the newsletter at any time. Every newsletter contains an unsubscribe link.

3. LEGAL BASIS FOR PROCESSING

We process your personal data on the following legal grounds:

- **Performance of an agreement:** The processing of personal data is necessary for the performance of the agreement we enter into with you when you use our services. Processing of message data is based on the performance of an agreement (namely the facilitation of communication within the Message Service). Processing of data via the contact form on our website is based on the performance of an agreement or steps taken at the request of the data subject prior to the possible conclusion of an agreement.
- **Consent:** When you use the Platform, we ask your explicit consent to share your personal data with the relevant the Client. The sharing of Spotify data is based on explicit consent from the relevant User. This consent can be withdrawn at any time without affecting the lawfulness of the processing before the withdrawal. We send newsletters only after you have given us your consent. By leaving feedback or a rating, you give us permission to process the personal data contained therein.
- **Legitimate interest:** We process personal data to improve our services, manage business relationships and communicate with users, within the limits of the law. The processing of messaging data is based on legitimate interest to ensure the security of our services and to comply with our legal obligations. In addition, we have a legitimate interest in using Google Tag Manager and third-party services for lead generation and data enrichment to analyse and optimise website performance, commercial and marketing activities. Processing feedback may be justified on the basis of legitimate interest, namely improving service and ensuring customer satisfaction.

4. DATA EXCHANGE BETWEEN DRIVER AND PASSENGER

When a passenger books a ride through the Platform, certain personal data is shared between the driver and the passenger to enable and facilitate the ride. This data sharing is necessary for the performance of the agreement between the two parties and for the safe and efficient execution of the ride.

The following data will be shared:

- **With the Driver:** The name, contact details (such as phone number), and any additional information of the Passenger required to perform the ride and enable communication.
- **With the Passenger:** The name, contact details (such as phone number), and location details of the driver (subject to the randomised display of the starting point of the ride).

This data sharing is essential to enable the booking and execution of rides, including providing information to both parties so that they can reach each other and coordinate the ride. This data is shared only for the purpose of the specific ride booked and may not be used by either party for any other purpose, such as commercial or promotional activities.

Legal basis for this data exchange

The legal basis for this processing is the necessity for the performance of a contract to which the data subject is a party. Both drivers and passengers, by using the Platform and booking a ride, implicitly consent to this data exchange, which is necessary for the provision of the service.

5. DATA SHARING WITH THIRD PARTIES

We only share your personal data with third parties under the following conditions:

- **Clients:** Your personal data will be shared with the Client who has installed the Platform on its website solely for the purposes stated in this privacy statement.
- **Payment service providers:** Payments are processed through Stripe Connect. Your payment details are provided directly to Stripe and are subject to their privacy policy (<https://stripe.com/nl/privacy>).
- **Service providers:** We may engage third parties to provide IT services, hosting and maintenance of our systems, who may have access to personal data, but only to the extent necessary to provide services to us.
- **Third parties involved in the Message Service:** The Message Service is supported by a third party (third-party service provider): DigitalOcean. This third party stores the data of the Message Service within the Netherlands (Amsterdam). This third party processes this data exclusively on our behalf and on the basis of the (processor) agreement concluded between us and DigitalOcean.
- **Google Tag Manager:** Data may be shared with Google as part of the use of Google Tag Manager. This data may be transferred to and stored on servers outside the European Economic Area (EEA), subject to appropriate safeguards such as the use of standard contractual clauses and EU-U.S. Data Privacy Frameworks (DPF). For Google's privacy statement, see: <https://policies.google.com/privacy?hl=en>.
- **Third-party lead generation and data enrichment services:** The (business) information collected by these third parties may be shared with the company's marketing and sales team to identify potential business opportunities (lead generation) and data enrichment.
- **Spotify:** If users choose to link their Spotify account, certain data will be shared with Spotify. This data processing is subject to Spotify's privacy policy (<https://www.spotify.com/nl/legal/privacy-policy/>). This may involve the transfer of data to servers outside the EEA in connection with the use of Spotify.
- **Feedback data:** Feedback data may be shared with third parties, for example an analysis agency or a service that helps with customer satisfaction surveys. These third parties only process the data on our behalf and on the basis of the (processor) agreement we have concluded with this third party.
- **Newsletter:** To send the newsletter, we use third-party services, which send the newsletters for us. These third parties process your personal data exclusively on our behalf and on the basis of the (processor) agreement we have concluded with this third party.
- **(Government) agencies:** We may share data relating to a particular ride, including your personal data, with (government) agencies, if the competent (government) agencies request or compel us to do so, for example in the case of (investigation or criminal prosecution of) a criminal offence.

6. DATA PROTECTION

We take appropriate technical and organisational measures to protect your personal data against loss, misuse, unauthorised access, disclosure, alteration or destruction. We use encryption technologies and secure connections to protect your data. In addition, appropriate technical and organisational measures are taken to ensure the security of data shared via the Spotify link, including encryption and secure connections.

In the event of a data breach likely to pose risks to the rights and freedoms of data subjects, we will report this data breach to the Personal Data Authority and, if necessary, to the data subjects themselves in accordance with legal obligations.

7. RETENTION PERIODS

We do not retain your personal data for longer than necessary for the purposes for which it was collected, unless a longer retention period is required or permitted by law. We use an automated system to delete personal data that no longer needs to be stored.

Account

We will retain the personal data associated with your account for as long as your account is active. After the termination of your account, we retain your personal data for a specific period of time, which may vary from 6 months to 2 years, depending on the type of data and our legal obligations. This period allows us to comply with administrative requirements and effectively handle any queries or disputes. After this period, your data will be securely deleted from all our systems. The exception is personal data included in our financial records, which we are legally obliged to keep for 7 years.

Google Tag Manager

Apart from data in standard HTTP request logs, all of which are deleted within 14 days of receipt by Google Tag Manager, and the diagnostic data mentioned above, Google Tag Manager does not collect, store or share any information about visitors to our website, including visited page URLs.

Spotify

Spotify data is kept only as long as the link is active and is deleted or anonymised once the link is terminated.

8. PROFILING AND AUTOMATED DECISION-MAKING

As part of our services, we may use profiling. Profiling means that we can create a profile of you based on collected personal data to better tailor our services to your needs and preferences.

Please note that we do not use automated decision-making that has legal consequences for you or otherwise significantly affects you, as referred to in Article 22 of the General Data Protection Regulation (GDPR). All decisions we make that may affect you are always made with human intervention.

If you have any questions about our profiling or your rights in relation to your personal data, please contact us using the contact details at the bottom of this page.

9. RIGHTS OF DATA SUBJECTS

You have the right to:

- Access the personal data we process about you;
- Have inaccurate or incomplete personal data corrected;
- Request deletion of your personal data;
- Restrict the processing of your personal data;
- Object to the processing of your personal data;
- Withdraw your consent, without prejudice to the lawfulness of processing based on consent before the withdrawal;
- Request access to your messaging data and request deletion of such data where technically and practically possible.
- Request access to the data collected via Google Tag Manager, third-party lead generation and data enrichment services, Spotify and the contact form, as well as the right to have this data corrected or deleted, to the extent possible. Users who have linked their Spotify account can withdraw their consent via their account settings. The withdrawal of consent does not affect the lawfulness of the processing prior to the withdrawal.

10. COOKIES AND TRACKING VIA GOOGLE TAG MANAGER AND APOLLO.IO

We use cookies to improve the functionality of our website and collect usage statistics. Please refer to our Cookie Policy for more information on how we use cookies (<https://slinger.to/privacy-policy-b2b/>). In our Cookie Policy, we clearly explain which cookies are used in connection with Google Tag Manager and Apollo.io, what they do and how users can give or withdraw their consent.

11. CHANGES TO THIS PRIVACY STATEMENT

We may update this privacy notice from time to time. The current version of the privacy notice will always be available on our website. We will specifically notify users if any substantial changes are made to the way messaging data is processed.

12. CONTACT DETAILS

If you have any questions about this privacy statement or wish to exercise your rights, please contact us at:

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