

Wheels Privacy Notice

Last updated as of January 28, 2020

Thank you for visiting Wheels Labs, Inc.'s ("Wheels") websites located at www.wheels.co and www.takewheels.com (collectively, "Sites") and/or mobile application ("App").

Wheels is an electric mobility platform that provides shared mobility devices ("Vehicles") as a better way to get around cities through the connection of a smartphone (together with the Sites and App, the "Services"). In order to provide the Services, we collect and process personal information.

This Privacy Notice and our Cookie Notice govern how Wheels collects, uses, stores and discloses personal information that we obtain through or from individuals who use our Services, including:

- Individuals who visit, access, download or use the Services;
- Individuals who contact us via our contact form on the Services;
- Riders who pay to find, unlock/lock and ride Vehicles ("Riders");
- Independent contractors who find and relocate our Vehicles and earn some money in the process ("Transporters"), including individuals applying to be a Transporter; and
- Members of our Warehouse Teams and Field Teams, who handle on-the-ground operations (collectively "Warehouse and/or Field Team Members"), including individuals applying to be a Warehouse and/or Field Team Member.

This Privacy Notice covers our Sites, our App and any other websites, products, software, applications, content, data feeds and other services on which authorized links to this Privacy Notice and Cookie Notice are posted.

IF YOU ARE CALIFORNIA RESIDENT: If you are a resident of California, this entire Privacy Notice applies to you. However, please see the section titled "[Additional Notices for California Consumers](#)" below, which will inform you in detail about our information collection practices and your specific rights.

IF YOU ARE AN INDIVIDUAL LOCATED IN THE EEA: If you are located in the European Economic Area ("EEA"), this entire Privacy Notice applies to you. However, please see the Section titled "[Additional Information for Users in the European Economic Area](#)" below, which will inform you in detail about our legal bases for processing your rights regarding the processing of your personal data.

IF YOU ARE A RESIDENT OF NEVADA: If you are a resident of Nevada, this entire Privacy Notice applies to you. However, please see the Section titled "[Notice to Nevada Consumers](#)" below, which will also apply to you.

We recommend that you read this Privacy Notice carefully as it provides important information about your personal information. It also tells you about your rights under the law may protect you.

If you have any questions, comments, or concerns regarding this Privacy Notice and/or our data practices, or would like to exercise your rights, do not hesitate to contact us at privacypolicy@wheels.co or see our information below.

Who We Are / Data Controller

If you use our Services, except as may be stated in this Privacy Notice, the **data controller** of your information is Wheels Labs, Inc., a California corporation with the following contact information:

Wheels Labs, Inc.

8730 Sunset Blvd.
Los Angeles, California 90069
United States

Children's Privacy

Our Services are not intended for individuals under the age of 18, and Wheels does not target the Services to minors.

Wheels does not knowingly collect personal information from children under the age of 18. If you are under the age of 18, please do not register to use the Services and do not provide us with any personally identifiable information.

What Personal Information Do We Collect and How Is It Collected?

Depending on who you are and why you are using our Services, we collect different types of information.

“Personal data” – or “personal information” as also used throughout this Privacy Notice – means any information about an individual from which that person may be identified. For example, it may include your name, telephone number, email address, payment information, and your IP address, device ID and location information. It does not include data from which the identity of an individual has been definitively removed along with any identifiers connected to such individual.

When you visit or use our Services, we collect personal information [directly](#) from you when you provide it to us, as well as [indirectly](#) through automated technologies such as cookies.

Information Collected Directly

What personal information we collect will depend on whether you are a Rider, a Transporter or a Warehouse and/or Field Team Member, as explained below.

Account Registration Information

To register to use our Services, we request certain personal information from you:

- your telephone number to verify your identity and/or send messages; and
- your location information – which you can set as “Always” or “While Using the App” in order to use the Services and our Vehicles ([note](#) that if you set “Never” we won’t be able to provide some of our Services) – and is further explained [here](#).

Payment Information

If you wish to use our Vehicles, or work for us as a Transporter, we will also need to process your payment information in order to get you started, add credits to your account, keep track of your credits, and in the case of Transporters, pay you. Payment processing is performed by third-party service providers, as explained [here](#).

Contact Information

If you contact us for more information via our Services, or are a Transporter or a Warehouse and/or Field Team Member, we will collect additional contact information:

- your email address; and
- your home address for Transporters and Warehouse and/or Field Team Members, in order to determine if you live near where you will be working.

Identification and Age Verification

Our Services – and the use of our Vehicles – are only intended for individuals age 18 and over. As such, to use our Services and/or Vehicles in certain locations, we require that you upload a photograph of your valid driver's license or government-issued identification in order to use our Services. This photograph will be stored on our secure systems in order to validate your age and identity. If you are under the age of 18, you may not use our Services and you shall not upload a photograph of your driver's license or government-issued identification.

Communication Information

When you contact us via email, submit contact forms on our Services or otherwise, we also collect and process any additional information, which may include personal information, that you voluntarily submit to us in those emails, contact forms or other communications.

As explained in the Terms of Use, we may contact you by telephone or text messages (including by an automatic telephone dialing system) for marketing purposes, in which case we will process any information derived therefrom as set forth in the Privacy Notice. You may opt out at any time by replying 'STOP' to cancel or by contacting Wheels directly at privacypolicy@wheels.co. Standard message and data rates will apply.

Screening and Application Information

If you apply to be a Transporter or a Warehouse and/or Field Team Member, we will collect additional information via our third-party service providers.

For Transporters, you will be directed to the secure landing pages hosted by our third-party service providers, such as Unbounce or Fountain, where we will collect the following information:

- full name;
- e-mail address;
- telephone number; and
- responses to questions regarding your availability.

Once we have screened you and approved you to join our team, you will be directed to complete a 'Repositioning Partner Agreement', after which you will be prompted to provide payment information via our payment processor, Stripe.

For Warehouse and/or Field Team Members, you will be directed to our third-party service provider's (e.g., Fountain's) secure landing page, which will collect the following information:

- full name;
- email address;
- telephone number; and
- responses to questions regarding your availability, preferences and questions designed to determine if you would be a good match for our Wheels team.

Once you have completed the process, we will review your information. If you are asked to join the Wheels Warehouse or Field Team, you will be directed to the company that will be your employer of

record. Your employer of record may collect additional information from you, subject to such company's privacy notice available. For instance, in the United States we work with Target CW. Please note that your employer of record will be a data controller of the information they collect from you.

Information Collected Indirectly

Device and Usage Information

When you download, use or interact with the Services, even if you do not have an account, we, or authorized third parties engaged by us, may automatically collect information about your use of the Services via your device, some of which information is personal information. Device and Usage Information that we collect consists of:

- **Information About your Device:** information about the devices and software you use to access the Services – primarily the internet browser or mobile device that you use, the website or source that linked or referred you to the Services, your IP address or device ID (or other persistent identifier that uniquely identifies your computer or mobile device on the Internet), the operating system of your computer or mobile device, device screen size, and other similar technical information.
- **Usage Information:** information about your interactions with the Services, including access dates and times, hardware and software information, device event information, crash data, cookie data. This information allows us to understand the screens that you view, how you've used the Services (which may include administrative and support communications with us or whether you have clicked on third-party links), and other actions on the Services. We, or our authorized third parties, automatically collect log data when you access and use the Services, even if you have not created an account or logged in. We use this information to administer and improve the Services, analyze trends, track users' use of the Services, and gather broad demographic information for aggregate use.

Location Information

We, or authorized third parties, collect your GPS latitude/longitude coordinates, which we can convert into city, metro code, zip code, state, country, and area code. This is necessary for us to locate our Vehicles, in order to make them available to Riders and let our Transporters and Warehouse and/or Field Team Members know where to find them, as well as to take certain actions remotely to ensure that our Vehicles are in compliance with applicable laws (such as parking regulations and speed limits).

Cookies and Similar Technologies

We, or authorized third parties, collect some information, including Device and Usage Information, by automated means using cookies, and server logs for analytic purposes. For more information on our use of cookies and the data that they collect, see our **Cookie Notice**.

Analytics Information

With the Device and Usage Information collected by our third-party analytics services, such as Google Analytics, we generate and process aggregated information, such as statistical or demographic data. Aggregated Information may be derived from personal data, but is not considered personal data under the law if it does not directly or indirectly reveal your identity. For example, we may track the total number of visitors to our Services or the number of visitors to each page of our Services, and we may aggregate usage data to calculate the percentage of users accessing a specific feature of the Services and analyze this data for trends and statistics.

However, if we combine or connect Aggregated Information with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data, which will be processed in accordance with this Privacy Notice.

Information from Third Parties

In some instances, we process personal information from third parties, which consists of data from our partners, such as transactional data from providers of payment services or information regarding job applicants. If you are applying to be a Transporter or a Warehouse and/or Field Team Member, or for other jobs, we receive information that is collected by our third-party service providers, such as Fountain, Unbounce and/or Target CW, in connection with your application process, which will be processed in accordance with this Privacy Notice.

Why We Collect Your Personal Information and How We Use It

Our mission is to provide safe, efficient and high-quality Services, and we, or our authorized third-party service providers who assist us in providing the Services, process your personal information for this purpose. Personal information is generally processed in order to:

- Provide you access to and use of the Services, including verifying your age, registering to use the Vehicles and enabling you to make payments, as well as to enforce our Terms of Use and/or Rental Agreement with you if necessary;
- Enable you to use the Vehicles, which includes matching your location with available Vehicles, or in the case of Transporters and Warehouse and/or Field Team Members, Vehicles that need to be picked up or serviced;
- Enable you to join our team as a Warehouse and/or Field Team Member or Transporter;
- Improve the content and general administration of the Services and enhance user experience;
- Provide customer support;
- Detect fraud, illegal activities or security breaches;
- Provide you with notices regarding purchases and keep track of your credits;
- Ensure compliance with applicable laws, such as parking rules or speed limits;
- Respond to your queries and requests, or otherwise communicate directly with you;
- Perform system maintenance and upgrades, and enable new features;
- Conduct statistical analyses;
- To send you marketing text messages if you have opted in to receive them on the telephone number that you provided; and
- Provide information to regulatory bodies when legally required, and only as outlined in this Privacy Notice.

For users located in the EEA, please visit this [Section](#) for more information on our legal bases for processing.

Managing Your Preferences

If personal data about you changes, or if you no longer desire to use our Services, you may delete your account or contact us at privacypolicy@wheels.co. We will respond to your request within a reasonable timeframe.

Disclosure of Your Personal Information

We disclose your personal information to the third parties indicated below:

- Companies that do things to help us provide the Services: hosting service providers, user engagement and customer support providers, job application service providers, payment service providers, communication tools, and analytics tools;
- Professional service providers, such as auditors, lawyers, consultants, accountants and insurers;
- Governments, regulators, law enforcement and fraud prevention agencies, but only as authorized as explained [here](#);
- Third party organizations, in the event of a business transfer, sale, merger or bankruptcy.

Third-Party Service Providers

Wheels discloses users' information to our third party agents, contractors, or service providers who are hired to perform services on our behalf. These providers may operate or support certain functions of the Services, and in some cases collect information directly, for example in the [Payment Processing](#) and [Job Application Processing](#) sections contained in this Privacy Notice. Below is an illustrative list of functions for which we may use third-party service providers:

- Analytics services
- Customer support services
- Billing services and payment gateway providers
- Hosting and content delivery network services
- Job application/fielding service providers
- Workforce management provider
- Functionality and debugging services
- GPS providers

Business Transfers

As we continue to grow, we may purchase websites, applications, subsidiaries, other businesses or business units. Alternatively, we may sell businesses or business units, merge with other entities and/or sell assets or stock, in some cases as part of a reorganization or liquidation in bankruptcy. As part of these transactions, we may transfer your personal information to a successor entity upon a merger, consolidation or other corporate reorganization in which Wheels participates, or to a purchaser or acquirer of all or a portion of Wheels' assets, bankruptcy included.

Anonymized Information

We share aggregated, automatically-collected or otherwise non-personal information with third parties for various purposes, including (i) compliance with reporting obligations; (ii) for business or marketing purposes; (iii) to assist us and other parties in understanding our users' interests, habits and usage

patterns for certain programs, content, services, advertisements, promotions and/or functionality available through the Services. We do not share personal information about you in this case.

Legal Obligations and Security

In addition, Wheels will preserve or disclose your personal information in limited circumstances (other than as set forth in this Privacy Notice), including: (i) with your consent; (ii) when we have a good faith belief it is required by law, such as pursuant to a subpoena, warrant or other judicial or administrative order (as further explained below); (iii) to protect the safety of any person; to protect the safety or security of our Services or to prevent spam, abuse, or other malicious activity of actors with respect to the Services; or (iv) to protect our rights or property or the rights or property of those who use the Services.

If we are required to disclose personal information by law, such as pursuant to a subpoena, warrant or other judicial or administrative order, our policy is to respond to requests that are properly issued by law enforcement within the United States or via mutual legal assistance mechanism (such as a treaty). Under such circumstances, we may at our discretion attempt to provide you with prior notice that a request for your information has been made in order to give you an opportunity to object to the disclosure. However, government requests may include a court-granted non-disclosure order, which prohibits us from giving notice to the affected individual.

Note that if we receive information that provides us with a good faith belief that there is an exigent emergency involving the danger of death or serious physical injury to a person, we may provide information to law enforcement trying to prevent or mitigate the danger (if we have it), to be determined on a case-by-case basis.

Payment Processing

We do not directly collect your payment information and we do not store your payment information. We use Stripe, a third-party, PCI-compliant, payment processor, which collects payment information on our behalf in order to complete transactions. While our administrators are able to view and track actual transactions via the Stripe customer portal, with the exception of the last 4 digits of your credit card, credit card type, zip code and expiration date, we do not have access to or process your credit card information. Please review Stripe's privacy policy to learn more about how it collects, processes and protects your personal information.

Job Application Processing

For individuals who are applying to be a Transporter or Warehouse and/or Field Team Member, we do not directly handle job applicant information and hiring, but store some information as described [here](#) in this Privacy Notice. We use third-party service providers who provide hiring automation software or landing pages and contact forms, in order to manage job applicants.

“Do Not Track”

Wheels responds to Do Not Track (“DNT”) browser signals. For more information on DNT settings generally, please visit <https://allaboutdnt.com>.

How Long Do We Keep Your Personal Information?

General Retention Periods

We use the following criteria to determine our retention periods: the amount, nature and sensitivity of your information, the reasons for which we collect and process your personal data, the length of time we have an ongoing relationship with you and provide you with access to our Services, and applicable

legal requirements. We will retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to comply with applicable legal, tax or accounting requirements). Additionally, we cannot delete information when it is needed for the establishment, exercise or defense of legal claims (also known as a “litigation hold”). In this case, the information must be retained as long as needed for exercising respective potential legal claims.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), we will securely store your personal information and isolate it from any further processing until deletion is possible.

If you have questions about, or need further information concerning, our data retention periods, please send an email at privacypolicy@wheels.co.

Time Frame of Deletion

If personal data can no longer be retained or is no longer necessary, it will be erased or anonymized without undue delay, generally within one month, unless exceptions apply.

Anonymization

In some instances, we may choose to anonymize your personal data instead of deleting it, for statistical use, for instance. When we choose to anonymize, we make sure that there is no way that the personal data can be linked back to you or any specific user.

Protecting Your Personal Data

No method of transmission over the Internet, or method of electronic storage, is 100% secure, however we take steps that are reasonably necessary to securely provide our Services. We have put in place reasonably appropriate security measures designed to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. We limit access to personal data only to those employees, agents, contractors and the third parties who have a business need-to-know.

We also have procedures in place to deal with any suspected data security breach. If required, we will notify you and any applicable regulator of a suspected data security breach. We also require those parties to whom we transfer your personal information to provide acceptable standards of security.

International Transfers

We are located in the United States, and the personal information that we collect is stored on servers located in the United States. This means that your personal information will be collected, processed and stored in the United States, which may have data protection laws that are different from (and sometimes less protective than) the laws of your country or region, such as the GDPR.

By sending us personal information, you agree and consent to the processing of your personal information in the United States, which may not offer an equivalent level of protection to that required in other countries (particularly the European Union), and to the processing of that information by us on servers located in the United States, as described in this Privacy Notice.

We have implemented safeguards designed to ensure that the personal information we process remains protected in accordance with this Privacy Notice, including when processed internationally or by our third-party service providers and partners. The safeguards we may take in our discretion include, for instance, entering into binding agreements in connection with any onward transfers of Personal Information. We may implement other mechanisms and take similar appropriate safeguards with our third-party service providers and partners. Further details can be provided upon request.

Changes to this Privacy Notice

Wheels may update this Privacy Notice (and the Cookie Notice) from time to time, at its sole discretion. If so, we will post an updated Privacy Notice within the Services along with a change notice. Changes, modifications, additions, or deletions will be effective immediately on their posting to the Services. If we make significant changes, we may also send registered users a notice that this Privacy Notice has been changed. We encourage you to review this Privacy Notice regularly for any changes. Your continued use of the Services and/or your continued provision of personal information to us after the posting of such notice will be subject to the terms of the then-current Privacy Notice. If you continue to use the Services you will be deemed to have accepted the change.

How To Contact Us About Privacy

If you have any questions regarding this Privacy Notice please contact Wheels at privacypolicy@wheels.co or at the address below:

Wheels Labs, Inc.
8730 Sunset Blvd.
Los Angeles, CA 90069
United States

Notice to Nevada Consumers

We do not sell your personal information within the scope of, and according to the defined meaning of, a “sale” under NRS 603A.

Additional Information for Users in the European Economic Area

Categories of Recipients of Personal Data

The categories of recipients of personal data with whom we may share your personal data are listed in [Disclosure of Your Personal Information](#) above.

Purpose of the Processing and Legal Bases

Wheels uses your personal information for a number of different purposes, as explained [here](#). Some are essential for us to provide the Services you use or to fulfill our legal obligations, some help us run the Services efficiently and effectively and some enable us to provide you with more relevant and personalized offers and information. In all cases we must have a reason and a legal ground for processing your personal information. Some of the most common legal grounds we rely on are briefly explained below.

Performance of a Contract

We may process your personal data for the purposes of a contract to which you are a party, in other words your ability to use the Services. For instance, if you want to find, unlock and ride a Vehicle, we need to process your Account Registration Information, Location Information and Payment Information in order to enable you to do so.

Legitimate Interests

We may process personal data where it is necessary for our legitimate business interests, but only to the extent that they are not outweighed by your own interests or fundamental rights and freedoms. We generally rely on legitimate interests to provide and maintain Services that work well and securely, comply with applicable laws, carry out fraud prevention, and generally improve the Services. When we rely on this legal basis, if required, we'll carry out a legitimate interest assessment to ensure we

consider and balance any potential impact on you (both positive and negative), and your rights under applicable data protection laws.

Consent

Wheels may rely on consent where it is required, such as with respect to certain Device and Usage Information collected via cookies and similar technologies (other than strictly necessary cookies), or when we’re asking you to confirm your marketing preferences. When we rely on consent, you’ll be asked to confirm that you give your permission to Wheels to process your personal information. Details of the processing, such as why Wheels would like to process your data, how it will be used and if your personal information will be shared, will be provided at the time of asking you for your consent.

You have the right to withdraw your consent at any time if you no longer wish to have Wheels process your personal data.

Legal Obligation

Wheels will on occasion be under a legal obligation to obtain and disclose your personal data. Where possible, we will notify you when processing your data due to a legal obligation, however this may not always be possible. For instance, Wheels may need to provide your data in order to prevent criminal activity or help to detect criminal activity, in which case we may share information with law enforcement. This is done in a safe and secure manner. It’s essential that Wheels complies with its legal, regulatory and contractual requirements, so if you object to this processing, Wheels will not be able to provide its Services to you.

The following table illustrates in more detail how the above legal bases for processing may apply to our primary purposes for processing different types of personal data:

Purpose of Processing	Legal Basis	Type of Personal Data Used for Purpose
To provide you access to and use of the Services, including verifying your age, registering to use the Vehicles and enabling you to make payments, as well as to enforce our Terms of Use and/or Rental Agreement with you if necessary.	Performance of a Contract	Account Registration Information Location Information Device and Usage Information Payment Information
To enable you to become a Transporter or Warehouse and/or Field Team member, as well as get paid for your services either by us or by your employer of record.	Performance of a Contract	Account Registration Information Location Information Device and Usage Information Payment Information Contact Information Screening and Application Information
To improve and enhance your experience with the Services, including the content and general administration of the Services.	Legitimate Interests	Location Information Device and Usage Information
To retain records as may be required for tax, legal and financial purposes.	Compliance With a Legal Obligation	Only such information as may be required

Purpose of Processing	Legal Basis	Type of Personal Data Used for Purpose
To understand how you access, use and interact with the Services in order to provide technical functionality, develop new products and services, and analyze your use of the Services, including how, where and why you use the Vehicles.	Legitimate Interests	Account Registration Information Device and Usage Information Location Information Payment Information Communication Information
To communicate with you for Services-related purposes only.	Performance of a Contract	Account Registration Information Contact Information Location Information Communication Information
To provide you with customer support in connection with your use of the Services.	Performance of a Contract	Contact Information Device and Usage Information Account Registration Information Location Information Communication Information
To detect fraud, illegal activities or security breaches.	Legitimate Interests, but in some cases the processing may be required for Compliance With a Legal Obligation	Only such information as may be required
To comply with applicable laws regarding the use of the Vehicles, including parking, zoning, speed and other relevant laws.	Legitimate Interests, but in some cases the processing may be required for Compliance With a Legal Obligation	Location Information Account Registration Information
To send you marketing messages via text message	Consent	Communication Information
To communicate with Transporters and/or Warehouse and/or Field Teams Members who are working with Wheels or would like to work with Wheels.	Performance of a Contract	Contact Information Location Information Communication Information Screening and Application Information
To receive and make payments.	Performance of a Contract	Account Registration Information Payment Information
To provide information to regulatory bodies when legally required, and only as outlined in this Privacy Notice.	Legitimate Interests, but in some cases the processing may be required for Compliance With a Legal Obligation	Only such information as may be required

Your Rights and Choices Under GDPR

If the GDPR applies to you because you are in the EEA, you have certain rights in relation to your personal data:

- The right to be informed – our obligation to inform you that we process your personal data (and that's what we're doing in this Privacy Notice);
- The right of access – your right to request a copy of the personal data we hold about you (also known as a 'data subject access request');
- The right to rectification – your right to request that we correct personal data about you if it is incomplete or inaccurate (though we generally recommend first making any changes in your Account Settings);
- The right to erasure (also known as the 'right to be forgotten') – *under certain circumstances*, you may ask us to delete the personal data we have about you (unless it remains necessary for us to continue processing your personal data for a legitimate business need or to comply with a legal obligation as permitted under the GDPR, in which case we will inform you);
- The right to restrict processing – your right, *under certain circumstances*, to ask us to suspend our processing of your personal data;
- The right to data portability – your right to ask us for a copy of your personal data in a common format (for example, a .csv file);
- The right to object – your right to object to us processing your personal data (for example, if you object to us processing your data for direct marketing); and
- Rights in relation to automated decision-making and profiling – our obligation to be transparent about any profiling we do, or any automated decision-making.

These rights are subject to certain rules around when you can exercise them. If are located in the EEA and wish to exercise any of the rights set out above, please contact us (see [How to Contact Us About Privacy](#)).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights) unless your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request under those circumstances.

We may need to request specific information from you to help us confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We will respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated as required by law.

In addition, if you no longer wish to receive our marketing/promotional information, we remind you that you may withdraw your consent to direct marketing at any time directly from the unsubscribe link included in each electronic marketing message we send to you. If you do so, we will promptly update our databases, and will take all reasonable steps to meet your request at the earliest possible opportunity, but we may continue to contact you to the extent necessary for the purposes of providing our Services.

Finally, you have the right to make a complaint at any time to the supervisory authority for data protection issues in your country of residence. We would, however, appreciate the chance to address your concerns before you approach the supervisory authority, so please contact us directly first.

If you are a user in the EEA, you may also contact our representative in the European Union:

Wheels France SAS

Additional Information for California Residents

This Privacy Notice for California Residents (“CCPA Notice”) supplements the information contained in the Privacy Notice and applies solely to all visitors, users, and others who reside in the State of California (“Consumers”). We have created this CCPA Notice in order to comply with the California Consumer Privacy Act of 2018 (“CCPA”).

Categories of Personal Information We Collect

Wheels collects personal information as that term is defined in CCPA: information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or device. In particular, within the last twelve (12) months, Wheels has collected the following categories of personal information from Consumers:

Category	General Examples
A. Identifiers.	A real name, unique personal identifier, online identifier, Internet Protocol address, email address, account name
B. Personal Information categories listed in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, address, telephone number, employment.
C. Protected classification characteristics under California or federal law.	Age, gender.
D. Commercial information.	Records of products purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
F. Internet or other similar network activity.	Browsing history, information on a Consumer’s interaction with a website or application.
G. Geolocation data.	Physical location or movements.
H. Sensory data.	Audio, visual information.
J. Inferences drawn from other personal information	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated Consumer information.
- Certain other information that is already regulated by other laws or regulations.

As explained in more detail here, Wheels obtains the categories of personal information listed above from the following categories of sources:

- *Directly from you.* For example, when you sign up to use the Services. This includes the following categories of personal information:

- A. Identifiers
 - B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
 - C.** Protected classification characteristics under California or federal law.
 - D. Commercial information
 - G. Geolocation data
 - H. Sensory Data
- *Indirectly.* For example, from observing your actions on our Services, including by the use of cookies or from third parties. This includes the following categories of personal information:
 - D. Commercial information
 - F. Internet or other similar network activity
 - G. Geolocation data
 - J. Inferences drawn from other personal information
 - *By observing Consumers' behavior through their purchases and activity on the Services.* This includes the following categories of personal information:
 - F. Internet or other similar network activity
 - G. Geolocation data
 - J. Inferences drawn from other personal information

Use of Personal Information

We may use, or disclose the personal information we collect for one or more of the following business purposes:

Categories of Information	Business Purpose
A. Identifiers B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) C. Protected classification characteristics under California or federal law D. Commercial information F. Internet or other similar network activity G. Geolocation data H. Sensory Data J. Inferences drawn from other personal information	To provide you access to and use of the Services, including verifying your age, registering to use the Vehicles and enabling you to make payments, as well as to enforce our Terms of Use and/or Rental Agreement with you if necessary.
A. Identifiers B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) D. Commercial information F. Internet or other similar network activity G. Geolocation data J. Inferences drawn from other personal information	To enable you to become a Transporter or Warehouse and/or Field Team member, as well as get paid for your services either by us or by your employer of record.

Categories of Information	Business Purpose
D. Commercial information F. Internet or other similar network activity G. Geolocation data J. Inferences drawn from other personal information	To improve and enhance your experience with the Services, including the content and general administration of the Services.
A. Identifiers C. Protected classification characteristics under California or federal law D. Commercial information F. Internet or other similar network activity G. Geolocation data H. Sensory Data	To retain records as may be required for tax, legal and financial purposes.
A. Identifiers B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) D. Commercial information F. Internet or other similar network activity G. Geolocation data J. Inferences drawn from other personal information	To understand how you access, use and interact with the Services in order to provide technical functionality, develop new products and services, and analyze your use of the Services, including how, where and why you use the Vehicles.
A. Identifiers B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) D. Commercial information F. Internet or other similar network activity G. Geolocation data	To communicate with you for Services-related purposes only.
A. Identifiers D. Commercial information F. Internet or other similar network activity G. Geolocation data	To provide you with customer support in connection with your use of the Services.
C. Protected classification characteristics under California or federal law D. Commercial information F. Internet or other similar network activity G. Geolocation data H. Sensory Data	To detect fraud, illegal activities or security breaches.

Categories of Information	Business Purpose
A. Identifiers B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) C. Protected classification characteristics under California or federal law F. Internet or other similar network activity G. Geolocation data H. Sensory Data	To comply with applicable laws regarding the use of the Vehicles, including parking, zoning, speed and other relevant laws.
A. Identifiers D. Commercial information	To send you marketing messages via text message
A. Identifiers G. Geolocation data	To communicate with Transporters and/or Warehouse and/or Field Teams Members who are working with Wheels or would like to work with Wheels.
A. Identifiers D. Commercial information F. Internet or other similar network activity	To receive and make payments.
Any category of personal information as may be required and only as outlined in this Privacy Notice	To provide information to regulatory bodies when legally required, and only as outlined in this Privacy Notice.

Wheels will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Disclosure of Personal Information

Wheels may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the services for us.

As explained in more detail [above](#), we share your personal information with certain categories of third parties who assist us in providing our Services and with our business.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, Wheels has disclosed the following categories of personal information for a business purpose:

- A. Identifiers
- B. personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- C. Protected classification characteristics under California or federal law
- D. Commercial information
- F. Internet or other similar network activity
- G. Geolocation data

- H. Sensory Data
- J. Inferences drawn from other personal information

We disclose your personal information for a business purpose to the following categories of service providers or third parties:

- Companies that do things to help us provide the Services: hosting service providers, user engagement and customer support providers, certain analytics providers, payment service providers, communication tools;
- Professional service providers, such as auditors, lawyers, consultants, accountants and insurers.

Sales of Personal Information

In the preceding twelve (12) months, Wheels has not sold (as defined in the CCPA) your personal information.

Your Rights and Choices Under CCPA

The CCPA provides Consumers with specific rights regarding their personal information, provided that we are able to verify their identities as explained [here](#). This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that Wheels disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive your request **and verify your identity** (see [Exercising Access, Data Portability, and Deletion Rights](#)), we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;
- Our business or commercial purpose for collecting or selling that personal information;
- The categories of third parties with whom we share that personal information; and
- The specific pieces of personal information we collected about you (also called a data portability request).

Deletion Request Rights

You have the right to request that Wheels delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive your request **and verify your identity** (see [Exercising Access, Data Portability, and Deletion Rights](#)), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) for certain reasons as permitted and set forth in the CCPA. These reasons include (just to name a few):

- Completing the transaction for which the personal information was collected;
- Providing a good or service requested by you;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, or prosecuting those responsible for such activities;
- Debugging products to identify and repair errors that impair existing intended functionality;
- Complying with a legal obligation;

- Making other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

Only you, or a person registered with the California Secretary of State that you authorize 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.

An authorized agent is a natural person or a business entity registered with the Secretary of State that a Consumer has authorized to act on his or her behalf. When a Consumer uses an authorized agent to submit a request to know or a request to delete, Wheels may require that the Consumer provide the authorized agent written permission to do so and verify their own identity directly with Wheels, unless the Consumer has provided the authorized agent with a valid power of attorney. Wheels may deny a request from an agent that does not submit proof that they have been authorized by the Consumer to act on his or her behalf.

To exercise the access, data portability, and deletion rights described above, please submit a verifiable Consumer request to us by either:

- [TOLL-FREE NUMBER] or [WEBFORM]
- privacypolicy@wheels.co

You may only make a verifiable Consumer request for access or data portability twice within a 12-month period. The verifiable Consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We 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.

Making a verifiable Consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account as a reasonable step toward verification when the request relates to personal information associated with that specific account. Please note that the methods for verification are set forth in the CCPA, which also requires us to consider a number of factors, such as type, sensitivity and value of the personal information or risk of harm posed by unauthorized access or deletion, on a case-by-case basis.

We will only use personal information provided in a verifiable Consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable Consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding our receipt of the verifiable Consumer's request. If applicable, our response we provide will also explain the reasons we cannot comply with a request. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable Consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you in a manner prohibited by the CCPA because you exercise your CCPA rights. Please note that to use our Services, we do require the collection of your personal information, for example to sign up or in order to complete a paid transaction. While you may request to delete your personal information under CCPA, such deletions may affect Wheels' ability to offer the Services.

Questions

If you have any questions regarding this CCPA Notice, please contact Wheels here:

Wheels Labs, Inc.

8730 Sunset Blvd.

Los Angeles, CA 90069

privacypolicy@wheels.co