

PRIVACY POLICY

Date: 20 July 2018

Ola Netherlands B.V., Ola UK Private Limited and their affiliates (including its parent company ANI Technologies Private Limited, referred to as ("**we**", "**us**", "**our**") are committed to protecting and respecting your privacy and providing with the information, options and choices necessary for you to control how we use your information. This privacy policy describes how we collect and use personal information to provide services operated by or on behalf of us. This policy applies to users of our website ("**Website**" or "**Site**") or mobile application ("**App**"). Users include:

- Riders who make requests for and avail transportation; and
- Driver-partners who provide transportation.

This policy (together with our policies on '*How we process your data*', '*Cookies and other technologies*' and '*To whom we transfer your data*') sets out:

- Information we collect about you
- How we use your information
- Our promotional updates and communications
- Who we give your information to
- Where we store your information
- Child safety
- Payment processing
- How we protect your information
- How long we keep your information
- Your rights
- Changes to this policy
- Contact us

For information on our collection and use of cookies, tags and other information, please see our policy on '[Cookies and other technologies](#)'.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

By engaging with the Site and/or App, you acknowledge you have read and understood this privacy policy.

For the purposes of the data protection laws and directives applicable to the European Union, (the "**Data Protection Law**"), the data controllers are:

- ANI Technologies Private Limited, registered at Regent Insignia, #414, 3rd Floor, 4th Block, 17th Main, 100 Feet Road, Koramangala, Bangalore - 560 034, Karnataka, India; and
- Ola Netherlands B.V., Joop Geesinkweg 901, 1114AB Amsterdam-Duivendrecht.

Information we collect about you

We will collect and process the following personal data from you:

- **Information you give us:**

This is information about you that you give us directly when you interact with us. This includes your profile information, login details, and other details required to create your register with us.

This is information about you that you give us by filling in forms on the Site or App or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use the Site or App, subscribe to our service, search for a product, place an order on the Site or App, participate in discussion boards or other social media functions on or via the Site or App, enter a competition, promotion or survey, submit a query, and when you report a problem with the Site or App.

The information you give us may include your name (including account username), address (including the city you live in), e-mail address and phone number, financial and credit card information, personal description (including age and gender), photograph, login and password details. It may also include certain personal details of your emergency contacts that you add to your account, and whether you have a connection with others whose personal data we may collect or hold, for example family members and friends. We may also access contacts stored on your device in order for you to add them to your favourites or emergency contacts. Please note that we do not import or sync your contact with the Site/App.

You may also choose to share details of your membership in any loyalty programs with which we are partnered, including the date and expiry details of the membership, membership number and points/rewards accrued.

- **Information we collect about you from your use of the Site and/or App:**

We will automatically collect information from you each time you visit the Site and/or use our App. This includes technical information, information about your visit, and your location data.

- Technical information
- Information about your visit
- Location data

Technical information may include the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, browser type, referring / exit pages and URLs, number of clicks, domain names, landing pages, pages viewed and other such information.

Information about your visit may include the full Uniform Resource Locators (URL), clickstream to, through and from our Site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number or social media handle used to connect with our customer service team. It may also include reference numbers used when you book a service through the Site or the App, and details of what, how, when and where you have engaged in services which we provide or services procured or booked using our services. Where the Services allow you to call or text other users using the Services, the information may also include call and text information, including the date, time and duration of the calls and texts.

Location data - we collect information through the Site/App as to your real time location to provide location services where requested or agreed to by you in order to deliver content and services that are dependent on knowing where you are, such as allowing passengers to find drivers, allowing drivers to find passengers for pickup and allowing the App to calculate the fare applicable to your journeys. Please note that we only collect your live location on the Site/App if you specify in your setting that you would like us to “always collect” your location. If you have not specified this, we not collect your live location unless you are accessing the Site/App or availing our services. This information is collected in combination with an identifier associated with your device to enable us to recognise your mobile browser or device when you return to the Site/App. You may also feed in your location manually in the Site/App. You may turn off location access using your device or not provide us your location manually, however, please note that without the ability to collect your location we will not be able to provide you our services.

Device information i.e. the devices you use (mobile phones, computers, tablets, etc.) to access our services such as the hardware models, operation system information, software information and version, file names, language preferences, IP address cookie information, advertising identifiers, browser version, device settings, and mobile network information. We may recognise your devices to provide you with personalised experiences and advertising across the services you use. Please see our policy on '[Cookies and other technologies](#)' for more information on how we use device information.

Other than your locations and device information, we do not link this automatically-collected data to personally identifiable information.

- **Information we receive from other sources.**

This is information we receive about you:

- if you use any of the other websites or apps we operate or the other services we provide.
- from third parties through whom you are able to access or register for the services (e.g. where you are able to log in with a Google or Facebook account).
- from third parties we work closely with.

In this case we will have informed you when we collected that data if we intend to share your data internally and combine it with data collected on this site. We will also have told you for what purpose we will share and combine your data.

We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, and search information providers). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

You may be given the option to access or register for the service through the use of your user name and passwords (or any other identifier) for certain services provided by third parties (each, an “integrated service”), such as through the use of your Google account, accounts with payment systems or wallet providers, or otherwise have the option to authorize an integrated service to provide personal data to us. By authorizing us to connect with an integrated service, you authorize us to access and store your personal data that the integrated service makes available to us (including but not limited to name, email address(es), date of birth, gender, current city and profile picture URL), and to use and disclose it in accordance with this policy. Please review the terms of service, terms of use and privacy policies of each integrated service carefully before using their services and integrating with our services. Please check your privacy settings on each integrated device to understand what personal data has been integrated with our services.

Depending on the nature of your dealings with us or the services which we provide to you or which you may obtain or make available to others using our services, we may collect other types of personal data from third parties, including:

- where you are involved in providing transport-related services, identification, taxation, government or regulatory identifier (such as drivers' licence details), and vehicle and insurance details;
- personal data relating to any complaints you make or are made about you, including recording of any calls in that regard;
- personal data collected and held via financial or payment systems about the payment mechanism or method that you might use (including credit card details) and the payments you may make for our services or any services procured or booked using our services;
- personal data collected by third-party marketing, survey and advertising service providers;
- personal data provided to any partners through which you create or access your account for the services, such as employee information provided to companies engaging in our corporate or other services, payment providers, social media services, on-demand media or services integrated with our services, or other websites (such as search engines) with which our services have been integrated;
- personal data which is accessible from your use of online sites or applications in which we have an interest or provide (such as messages for the purposes of issuing and receiving one time passwords and other device verification) and device-related or device-generated personal data. The latter might include your device details, device IDs, your location, network connections, network access and communication and session data. Location data may also be collected or derived from IP addresses, mobile numbers and network information.

You generally have the option of not identifying yourself or of using a pseudonym when dealing with us, but not where this is impractical (for example when you transact online with us or you apply to provide transport-related services) or where the law or a court order provides otherwise.

How we use your information

You can see a full list of the types of data we process, the purpose for which we process it, and the lawful basis on which it is processed [here](#).

Please note that we use the information you provide to us for automated decision making and profiling in order to effectively provide you our services.

We use information held about you in the following ways:

- **Information you give to us:**

We will use this information to:

- Take steps in order to enter into any contract or carry out our obligations arising from any contract entered into between you and us including:
 - administering your account with us;
 - verifying and carrying out financial transactions in relation to payments you make through the Site and/or the App;
 - notifying you about changes to our service.

- Provide you with information about our goods or services we feel may interest you, in our legitimate interests provided these interests do not override your right to object to such communications. See '*Our promotional updates and communications*' below.
- Ensure in our legitimate interests that:
 - content from our Site is presented in the most effective manner for you and for your devices.
 - we provide you with the information, products and services that you request from us.
- **Information we collect about you from your use of the Services**

We will use this information in our legitimate interests, where we have considered these are not overridden by your rights:

- To administer the Services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To keep the Services safe and secure.
- For measuring or understanding the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
- To improve the Services to ensure that content is presented in the most effective manner for you and for your computer.
- To allow you to participate in interactive features of our service, when you choose to do so.
- **Information we receive from other sources**

We will combine this information with information you give to us and information we collect about you in our legitimate interests (where we have considered that these are not overridden by your rights). We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Our promotional updates and communications

We will share promotional updates and communications with your consent or, where applicable, in our legitimate interest. Where permitted in our legitimate interest, we will use your personal information for marketing analysis and to provide you with promotional update communications by email, telephone, text messages, in-application messages and/or push messages about our products and/or services. We may also share your personal information with third-party social media and other partner platforms in order to provide you with promotional update communications. You may view our partner platforms [here](#).

You can object to further marketing at any time in your profile settings or by selecting the "unsubscribe" link at the end of all our marketing and promotional update communications to you.

Who we give your information to

We may give your information to:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, who support our processing of personal data under this policy. Our group entities include the data controllers identified in this Policy.
- Selected third parties.

Our selected third parties may include:

- Organisations who process your personal data on our behalf and in accordance with our instructions and the Data Protection Law. This includes in supporting the services we offer through the Site and/or the App in particular those providing website and data hosting services, providing fulfilment services, distributing any communications we send, supporting or updating marketing lists, facilitating feedback on our services and providing IT support services from time to time. These organisations (which may include third party suppliers, agents, sub-contractors and/or other companies in our group) will only use your information to the extent necessary to perform their support functions. A full list can be found [here](#).
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience and subject to the cookie section of this policy. We will not send any third-party advertisements without your consent.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site and subject to the cookie section of this policy (this will not identify you as an individual).
- Business partners who provide services to you via the Site or the App and with whom we have entered into agreements in relation to the processing of your personal data, a list of whom can be found [here](#).
- Parties necessary for the provision of services to you and with whom we have entered into agreements in relation to the provision of services. For example, if you have requested to use the service as a customer or a driver-partner, we will share only such personal information to facilitate and complete the service. We do not provide your contact details in such cases.
- Payment processing providers who provide secure payment processing services. Your payment card details are not shared with us by the provider.

We may also disclose your personal information to third parties:

- Where we think certain carefully selected partners may be of interest to you. These companies may contact you by post, email, telephone or fax for marketing or promotional purposes.
- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets subject to the terms of this privacy policy.
- If we or substantially all of our assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of supply other agreements with you; or to protect the rights, property, or safety of our drivers or customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction and to prevent cybercrime.

Where we store your information

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") that may not be subject to equivalent Data Protection Law. Where your information is transferred outside the EEA, we will take all steps reasonably necessary to ensure that your data is subject to appropriate safeguards, such as relying on a recognised legal adequacy mechanism, and that it is treated securely and in accordance with this privacy policy.

We may transfer your personal information outside the EEA:

- In order to store it.
- In order to enable us to provide services to you and fulfil our contract with you. This includes delivery of services that you have purchased (for example, if you are registered for the service in a country in the EEA but are using the App to book a service outside the EEA), processing of payment details, and the provision of support services.
- where we are legally required to do so.
- in order to facilitate the operation of our group of businesses, where it is in our legitimate interests and we have concluded these are not overridden by your rights.

We may transfer your personal information to the following countries outside the EEA such as India, Singapore, Indonesia, Ireland, the Philippines and the United States of America. Please see [here](#) for more information.

Child safety

The Website/App is intended for use only by persons who are at least 18 years of age. By using the Website/App, you confirm to us that you meet this requirement.

Payment processing

Payment details you provide will be encrypted using secure sockets layer (SSL) technology before they are submitted to us over the internet. Payments made on the Website/App are made through our payment gateway providers. You will be providing credit or debit card information directly to our payment gateway providers, which operate secure servers to process payment details, encrypting your credit/debit card information and authorising payment. Information which you supply to our payment service providers is not within our control and is subject to the respective providers' own privacy policy and terms and conditions.

How we protect your information

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the services; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Our Site may, from time to time, contain links to external sites. We are not responsible for the privacy policies or the content of such sites.

How long we keep your information

We retain personal data for (i) as long as you have an account with us in order to meet our contractual obligations to you, and (ii) for six years after that to identify any issues and resolve any legal proceedings. We may retain information for any other legal or regulatory requirement. We may also retain aggregate information beyond this time for research purposes and to help us develop and improve our services. You cannot be identified from aggregate information retained or used for these purposes.

Please note our retention periods for the following data:

- Derived data – 6 months.
- Structured system log data - 13 months.
- Unstructured app log data – 30 days.

Your rights

- Subject to applicable law, you have the right under certain circumstances:
 - to be provided with a copy of your personal data held by us. Such right of access can normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee, for instance where you request multiple copies of your personal data;
 - to request the rectification or erasure of your personal data held by us;

- to request that we restrict the processing of your personal data (while we verify or investigate your concerns with this information, for example);
 - to object to the further processing of your personal data, including the right to object to marketing (as mentioned in the section '*Our promotional updates and communications* above);
 - to request that your provided personal data be moved to a third party.
- You may opt out at any time from allowing further access by us to your location in your device settings. You can also stop all information collection by un-installing the App. You may use the standard un-install processes as may be available for your mobile device.
 - Your right to withdraw consent:

Where the processing of your personal information by us is based on consent, you have the right to withdraw that consent without detriment at any time by contacting us on the details provided below. You can also change your marketing preferences at any time as described in the section '*Our promotional updates and communications*' above. Please note that withdrawing of consent has no impact on earlier processing of your personal data on such basis and does not prevent us from invoking another available legal basis for the processing of such personal data;

- Right to lodge a complaint:

If your request or concern is not satisfactorily resolved by us, you may approach your [local data protection authority](#). The 'Information Commissioner' is the supervisory authority in the UK and can provide further information about your rights and our obligations in relation to your personal data, as well as deal with any complaints that you have about our processing of your personal data.

Riders may use the self-serve function on the Website/App in order to exercise the above rights. Drivers may exercise these rights by contacting us at dpouk@olacabs.com. We may reach out to you to verify your identity or fulfil any other verification requirements before processing a request.

Changes to this policy

Any changes we make to our privacy policy in future will be posted on this page and, in relation to substantive changes, will be notified to you by e-mail. To the extent permitted under applicable law, by using our services after such notice, you acknowledge and accept our updates to this policy. We encourage you to periodically review this policy for the latest information on our privacy practices.

This policy was last updated on 20 July 2018.

Contact Us

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to:

Ola Netherlands B.V.
 Joop Geesinkweg 901, 1114AB Amsterdam-Duivendrecht
 Email address: dpouk@olacabs.com

Ola UK Private Limited
1, Fetter Lane, London – EC4A 1BR, United Kingdom
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