

HOW WE PROCESS YOUR DATA

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Please note that this document only details the personal data we process, the manner in which we process it, and our legal bases for processing. For information regarding transfer of your data to third parties, please see here.

What data do we process

For an overview of the personal data we collect, the sources, how we use it and who we provide it to, please see our [Privacy Policy]. A detailed list of the personal data we is below. All personal data provided below may be used to provide you with our products and services.

If you are a customer:

Personal Data
Name
E-mail address
Phone number
Username
Password
Address
Pin code
Location
Pickup/drop location (address string)
Favourite locations (address string)
Name, phone number and e-mail address of emergency contacts
Referer and referee coupon details
Token
API keys
IP address
One-time password
Device details (IMEI number, brand, model and version number)
Frequency and time of usage site/application/ services

Payment modes
Derived pickup locations
Vehicle or ride category preference
Historical driver preference
Cancellation history
Fraud probability score
Interaction history with customer care
Discounts/offers applied

If you are a driver or partner:

Personal Data
Name
E-mail address
Phone number
Username
Password
Address
Pin code
Location
Pickup/drop location (address string)
Favourite locations (address string)
Name, phone number and e-mail address of emergency contacts
Referer and referee coupon details
Token
API keys
IP address
One-time password
Device details (IMEI number, brand, model and version number)
Driving License number and details
Vehicle registration number and details

VAT registration details
Chasis number
Device mobile number
Gender
Date of birth
Partner go-to location (address string)
Badge number
Partner lead phone number
Lead vehicle number
Referrer phone number
Referrer vehicle number
Primary address
Salutation
Fathers name
Cheque addresses
Bank address from partner bank account details
Bank name from partner bank account details
Branch name from partner bank account details
Billing address street
Ola point agent phone number
Ola point agent email
Ola point agent coupon code
Ola point guest phone number
Coupon code
Referral code
Caller number
Receiver number
Registered number
Agent email
Partner incoming phone
Partner email
Customer email

Distance travelled
Login time
Customer transactions
Discounts/offers applied
Rating history
Earning profile
Booking cancellation history
Booking acceptance history
Distance from user
Home location preference
Payment method preference
Fuel type of the car
Lease details of vehicle
Car maintenance history
Proximity to customer
Fraud probability score
Interaction history with customer care
Frequency and time of usage site/application/ services

Purpose of Processing

We conduct the following type of processing with your personal information (either in isolation or in combination):

- in connection with transport-related services by:
 - providing user's and driver's personal data (including current location, photograph, ratings and vehicle information) to each other in connection with the arrangement of specific transport-related services and to facilitate communications between drivers and users; and
 - using your location data to record and verify trip and payment information if you provide or procure transport-related services using our services or are logged onto our website or application;
- to store your data and retrieve as necessary to provide you with our services. We currently store all personal data in secure servers provided by Amazon Web Services, which are based in Singapore and the United States of America;
- to process and facilitate your payment for goods and services, including as required by law;

- for direct marketing. We will also share your personal information to OLA group entities for the purpose of direct marketing;
- for third-party advertising;
- for automated processing and data profiling (See ‘Automated decision making and profiling’);
- for verification of your identity;
- to develop insights about you or to personalise your offerings or experience in using our services or services of our third party business partners, including drivers;
- for research and development or to improve goods and services, for example in connection with safety and security and preventing fraud;
- where you are involved in providing transport-related services, for any purposes reasonably connected with your application and our assessment of your application, including identification, document verification, driving history, criminal history and background checks (including verification of health information and to verify whether you are a driver eligible to provide private hire vehicle services or taxi service) and other manual processing checks regarding the verification of drivers and vehicles. We will use and may also disclose to our affiliates and third-party partners your personal information to verify your vehicle and licence details, set up your account and also contact you regarding your process. This includes sending you communications from time to time to remind you complete your application if it is incomplete or if we need more information from you;
- to assist in dispute resolution, investigating complaints and in enquiries and support;
- for incidental or other purposes related to the provision of goods and services to you or the purposes referred to above. For example, we may disclose your personal data within the OLA group for OLA group’s internal operational purposes (including to help us provide our goods and services, and monitor and improve our goods and services), to service providers who assist us in our day-to ay business operations and as part of buying or selling businesses; and
- as required or permitted by law, court order and any government, law enforcement or other regulatory body.

The lawful bases on which we process your personal data

The personal data we collect and hold is what is reasonably necessary for the provision of services to you and our business functions and activities. The legal bases for OLA’s processing of personal data are primarily that:

- (i) the processing is necessary for providing our products and services in accordance with our terms of service and that the processing is carried out in our legitimate interests;
- (ii) the processing is necessary for the purpose of entering into or performance of a contract between you and us;
- (iii) the processing is required and/or authorized under applicable law;
- (iv) we have taken your consent where necessary.

Please note that one of our primary purpose of processing is automated decision making and profiling based on the personal data provided. Automated decision making and profiling is a necessary processing activities without which we will not be able to provide you with our services. To learn more, please see our section on ‘*Automated decision making and profiling*’.

We may process your personal data for other purposes which are within reasonable expectations. These may relate, for example to acting on your requests; our involvement in relationships between users, drivers and third party suppliers of goods or services to you.

We may also process your data for legal reasons such as: (i) legal process and legal requests; (ii) enforcement of the Terms of Service; (iii) claims that any content violates the rights of third parties; (iv) requests for customer service; (v) technical issues; (v) protecting the rights, property or personal safety of OLA, its users or the public; (vi) establishing or exercising our legal rights or defending against legal claims; or (vii) as otherwise required and/or permitted by law.

We may anonymise, de-identify or aggregate your personal data prior to processing. For example, we may do this for the purposes of conducting analytics, for example the use and disclosure of anonymised data to determine preferences and patterns and for business improvement.

If in the future we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information. Where necessary, we will procure your consent for such additional processing.

Automated decision making and profiling

We use automated decision making (including profiling) without human intervention, as provided in the purpose of processing provided above. We use various combinations of the personal data collected (as listed above) to be able to provide you with our services. We will not process personal data involving automated decision making unless necessary for the provision of our services or for performance of a contract.

The following types of automated decision making and profiling will be conducted as it is necessary to provide you our services.

- *Allocation of Vehicles, Route Determination, Pricing, Offers and Communications*

We use a combination of customer and driver personal data, such as:

- (i) customer data such as frequency and time of usage of our site/application/services, payment modes, pickup and destination area, derived pickup locations, vehicle category preference, device information, gender, age, historical driver preference, cancellation history, fraud probability score and/or interaction history with customer care; and
- (ii) driver data such as rating history, earning profile, booking cancellation history, booking acceptance history, distance from user, home location preference, payment method preference, fuel type of the car, leasing car, car maintenance history, proximity to customer, fraud probability score, and/or interaction history with customer care,

to allocate drivers' vehicles to requesting customers, and to determine the route and pricing. We also use a combination of the above information to communicate to customers and drivers regarding our offers, discounts, incentives and promotions. We also use this personal data to determine your preferences for pickup and destination locations,

- *Safety and Security*

Based on the name provided by you at the time of registration, we may determine your gender and provide services with the intention of ensuring your safety, security and comfort.

- *Device Information*

Based on the device information collected from you, combined with online sources for device prices, we may match your device information (including brand, model and version) with a device pricing catalogue to determine your economic status. Based on the category of economic status identified, we may provide personalised offers, communications and services.

- *Performance and Reliability of Users*

Based on user ratings and their work performance, including any complaints received by us, we may automate the allocation of drivers to customers and vice versa.

As automated decision making and profiling is conducted based on the varying requirements and interest of our users, we may combine the various other personal data provided to optimize the decisions listed above or to develop our services further. Please review this policy periodically to learn about any changes in how we conduct automated decision making or profiling.