Waave Inc. Privacy Policy

Waave Inc., (“Waave”, “Company”, “we” or “us”) is a company committed to protecting and respecting your privacy, as user or person contacting, visiting, or otherwise submitting information to Waave. Safeguarding your Personal Information is important to Waave and it recognizes the responsibility you entrust it when providing your Personal Information. This Privacy and Cookie Policy (“Privacy Policy”) details how your Personal Information is used by Waave or its affiliates, both actively and passively, when you use a Waave website, (“Site”), and/or download or use the Waave E-Hail Application (“App”), whether you are a driver, fleet, transportation provider, courier, passenger, delivery recipient or sender App user, site visitor, office visitor, or job applicant. With this policy (together with Waave's Terms & Conditions and any other documents referred to therein) Waave wishes to outline the basis on which any Personal Information Waave collects from you, your representative, or employer, or that you provide to Waave, will be processed including, what information it may collect from you via the Site and/or the App, how it will use it, how it may disclose information provided by you to third-parties and the use of “cookies” or similar files or tags on the Site and by the App.

Waave is committed to safeguarding your Personal Information (as defined below) in line with applicable data protection laws. Please read the following carefully to understand Waave's views and practices regarding your personal data and how Waave will treat it.

USER'S ACKNOWLEDGEMENT OF THIS POLICY

By using Waave's services (the “Services”) or registering, downloading information or entering the Site and/or the App you acknowledge that you are or have had the opportunity to become aware of this Privacy Policy and Waave's practices described therein, including the processing (including collecting, using, disclosing, retaining or disposing) of your information under the terms of this policy. The information Waave holds about you may be held and processed on computer and/or paper files.

In the event where you provide Waave with any information regarding another person, you procure that you have made them aware of this privacy policy.

If you have any questions or comments regarding privacy issues on the Site and/or the App, please contact Waave by email: info@waave.co

TYPES OF INFORMATION WE COLLECT

Waave collects both “Personal Information” and “Anonymous Information” about our users and visitors. Personal Information is information that can be used to contact or identify you, such as your full name, email address, phone number, payment method details, login name, password, mailing address, IP address, and profile picture, as well as information that is linked to such information.

“Anonymous Information” is information that we cannot use to contact or identify you and is not linked to information that can be used to do so. It includes passively collected information about your activities on the Site or on the App, such as usage data, to the extent that information is not linked to your Personal Information. You can access and browse certain portions of the Site and download the App without disclosing Personal Information, although, like most website and mobile app providers, we passively collect certain information from your devices, such as your IP address, screen resolution information, geographic location, Wi-Fi information, browser information, unique device identifier (“UDID”) where applicable and/or your mobile operating system, and use third-parties such as Mix panel and other SDK's to obtain detailed analytics on the device.

We also collect geolocation data from visitors that download and open the App. Sometimes, this passively collected information will constitute Personal Information. Please note that you can choose not to provide us with certain information (for instance, by adjusting your cookie settings), and it is your voluntary decision
whether to provide us with any such information but choosing not to will limit the features of the Site or the App you can access and use.

Voluntarily submitted information.

We collect information that you provide to us during your use of the Site, and/or App. Some examples include:

- Personal Information that you enter when registering for or using the App, including your full name, email address, phone number, payment method, billing information, profile picture and profile information;
- Communications with us (e.g. emails, text messages) or with other Passenger or Drivers (e.g. verbal or written instructions to Drivers); information you provide in your user preferences or surveys, to customer support services or customer support calls or that you post on any forums or message boards, including social media and blogs.
- We may record your customer support calls for quality assurance purposes and for improving our services; the provision of services or online content to deal with your requests and enquiries.
- This includes data you provide at the time of:
  o Registering to use the Site and/or the App.
  o Subscribing to any services or Waave offers.
  o Downloading information posted on the Site and/or the App.
  o Posting material.
  o Requesting further services from Waave.
  o Data you provide to us or to a third-party in connection with third-party loyalty schemes with which Waave partners, including loyalty ID or scheme membership number and information about points accrued.
  o Data you provide, including photos or comments, in connection with or participation in any promotions or competitions sponsored, promoted or offered by Waave and/or any third-party
  o and any data provided to Waave by way of feedback, profile forms or Site/App issues;
  o Data you provide, including a copy of your identification or credit card, in connection with instances where Waave needs to authenticate user identity and/or ownership of the payment method provided;
  o Information about you which you provide when corresponding with Waave by email, post, the App, SMS, messenger, telephone or otherwise, in which case Waave may keep a record of that correspondence to respond to your enquiries and improve its services;
  o Where you are a Driver, licensing information; and other information from your interaction with the Site and/or the App, services, content and advertising.
  o With regard to each of your visits to the Site and/or use of the App, Waave may automatically collect authentication data, technical information and information about your visit, including computer and connection information, statistics on page views, traffic to and from the Site, ad data, IP address, standard web log information and the resources that you access.

Information collected through use of the Site or the App:

- Geolocation data: If you access the App through a mobile device, we may access, collect, monitor and/or remotely store “geolocation data”, which may include the GPS coordinates of your trip (including pickup and drop-off data and route information) or similar information regarding the location of your mobile device.
- Contacts: We may access your address book, calendar, or contacts if you provide us with your permission to do so.
• Transaction data: We collect information created during your various interactions with the Service, including the date and time of any ride using the Waave Service (a “Ride”), distance of Ride, amount charged, including breakdown of base fee, tip and additional fees, as well as promotional code delivery.

**Information collected via technology:**

If you are using our Website, we collect information from you, including your hardware model, browser type, operating system, Internet Protocol (IP) and domain name. If you are using a mobile device, we may also receive your UDID, or another unique identifier, and mobile operating system. We may correlate this information with other Personal Information we have about you. We may also use cookies and URL information to gather information regarding the date and time you used the Service and the information for which you searched and accessed. In connection with your use of the App, we may receive your call data, including the date and time of calls and SMS messages with Waave or Drivers, the parties’ phone numbers and the content of those SMS messages.

We may also use third-party tracking services, and usage logs, to track and analyze data from users of the Service for purposes of security, fraud prevention, and money laundering prevention. If you choose to remit payment for a Ride via a third-party payment provider your Personal Information (excluding full payment card information) obtained by the payment provider may be given to us by such payment provider.

If you choose to login to the App or Site via a third-party social media website (e.g. Facebook), your Personal Information may be provided to us by such social media website. Waave may also share your data with its third-party statistical analytics service provider, solely for the provision of analytics and to better understand its users.

Because we rely on third-party commercial software and programs to operate our servers, we may inadvertently collect Personal Information due to certain automatic functions or features contained in such software or due to certain software changes or upgrades. We will use reasonable efforts to remove any such information after we discover such information in our system. If you know of any such unintended collections, please notify us promptly so we can take the necessary action to remove such information from our system.

**Information provided by others**

We collect information that Passenger provide about Drivers, and vice-versa, including via ratings and postings on forums or message boards. Waave may receive information about you if you use any of the other websites it operates or the other services it provides. Waave also works closely with third parties (including, for example, business partners, subcontractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them. Where third-parties collect information about you and share it with us, you should refer to their separately maintained privacy policies or notices.

**Information about your device**

Waave collects information about the device you use to access the Site, App and/or Services, which may include personal data. This information is used to recognize your device so that it can be linked to your account. This activity is carried out for the purposes of safety, security, evaluation of the performance of the app or the Site, improvement of the customer experience, fraud prevention and involves the sharing of information about your device including limited personal data, IP address, Wi-Fi and location information with a third-party service provider, the type, name and use of your device, browser (e.g. the Internet browser you are using such as: Chrome, Internet Explorer, Firefox, and your browser settings) and installed applications and widgets (“Installed Apps”), including the Installed Apps’ name, ID, system, installed date, update date, version, and whether it is on the home page. We also collect your interaction with those Installed Apps, including opening, closing, or uninstalling, and the duration of your use. We do not collect data within the Installed Apps, but rather solely aggregated data concerning use itself;
the visited websites (including the date and duration of such visits); the battery and network performance (i.e. battery status and charger use) of your device and the file names, types and files sizes on your device, including the amount of free and used local storage space, but not the contents of the files; and the system status, including device event information such as crashes and system activity.

**COOKIES AND OTHER WEB FILES OR TAGS**

In the interest of giving our Site an attractive appearance and in order to allow the use of certain functions, we use cookies on various pages of our Site, as well as other files and tags (e.g. JavaScript tags). Cookies consist of small text files that are stored on your device. Most of these cookies used by us will be erased from your hard drive immediately after your browser session (so-called session cookies).

Other cookies remain saved to your device’s hard drive and enable us to recognize your device in the event of a later visit to our website (so-called persistent cookies). It is particularly these cookies that allow us to make our Site more user-friendly, effective and safe. Thanks to these files, for example, it is possible to display information specifically suited to your personal preferences on a certain webpage. A cookie browser session lasts for the duration of 18 hours.

The cookies will, among other things, track clicks, and online activity. For the same reason, the Site and the App both use cookies and other local files to distinguish you from other users. Waave may use a cookie or configuration file, which is stored on the browser or hard drive of your computer and/or your mobile telephone device, to obtain information about your general internet usage. Cookies and other such files contain information that is transferred to your computer's and/or mobile telephone device's hard drive. They help Waave to improve the Site and the App, and to deliver a better and more personalized service.

They enable Waave:

- to estimate Waave's audience size and usage pattern and perform other analytics;
- to gather information about your approximate geographic location (e.g. city) to provide localized content;
- to store information about your preferences and to allow Waave to customize the Site and/or App according to your individual interests and the device or browser you are using;
- to continually improve Waave's Services;
- to recognize you when you return to the Site and/or App; and
- to prevent fraud and/or abuse. The legal grounds for processing the information contained in cookies and other such files or tags consists of the performance or entering into of a contract with you (where cookies are necessary as part of the customer journey), or otherwise our legitimate interests in a safe and user-friendly presentation of our Site. You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you select a setting that is too restrictive, you may be unable to access certain parts of the Site and/or App. Unless you have adjusted your browser setting so that it will refuse cookies, Waave’s system will issue cookies when you log on to the Site and/or use the App.

**Analysis Tools and Internet Technologies**

This website makes use of retargeting technologies that are administered by other operators. Through retargeting, users of our partners' websites, who were interested in our Site and in our Services before, can be approached with personalized advertisements. Studies show that the inclusion of personalized advertisements that are related to people’s actual interests are more appealing to the user than advertisements without any personal connection. Through retargeting, the incorporation of advertisements is based on the analysis of cookies that display earlier user's conduct. If you wish to object to this mode of advertisement, you can deactivate cookies and/or delete existent cookies through your browser settings. You can do so by following the instructions under “Cookies”. The legal basis for the processing of your data along with the use of collective
analytical tools and internet technologies is our legitimate interest in obtaining an analysis of the activities on
our website and the user's and surfer's behavior on the Site, notably for research, BI, and product development,
as well as our legitimate interest (and the interest of third-parties) in the inclusion of personalized
advertisements suited to your interests.

CLICKSTREAM DATA
As you browse the Internet, a trail of electronic information is left at each web site you visit. This information,
which is sometimes called “clickstream” data, can be collected and stored by a web site's server. Clickstream
data can tell us the type of computer and browsing software you use, the address of the web site from which
you linked to the Site, and in some instances, your email address. We may use clickstream data to determine
how much time visitors spend on each page of the Site and how they navigate through the Site. We will only
use this information to improve or customize the Site.

USES MADE OF THE INFORMATION
Waave uses information held about you (including both Personal and Anonymous Information) in the following
ways to:

• register and administer your account;
• provide our various Services, as further detailed on our Site;
• facilitate communications between Passengers and Drivers;
• offer customer support;
• ensure that content on the Site and/or the App is presented in an effective manner for you and for your
device (e.g. PC, mobile telephone, tablet);
• provide you with information about products or Services that you receive from Waave (sometimes called
“Service Messages”), for example, notices of updates to our Privacy Policy and invoices from Rides;
• carry out Waave's obligations arising from any contracts entered between you and Waave (including but
not limited to providing you with the information, goods and/or Services you request from it);
• validate and reimburse valid third-party loyalty coupons for Waave Rides and to notify third-party loyalty
partners about qualifying Rides which may accrue third-party loyalty scheme points;
• provide you with information (by email, SMS, messenger, post or telephone) about other goods and
Services Waave offers that are similar to those that you have already purchased or enquired about or which
may interest you, having first obtained your consent where required to do so (and subject always to your
right to opt-out of marketing messages.
• provide you with information (by email, SM, messenger, post or telephone) about goods or services offered
by Waave’s promotional partners which are relevant to Services you have requested from Waave, or which
we otherwise believe may interest you, having first obtained your consent where required to do so (and
subject always to your right to opt-out of marketing messages.
• allow you to participate in interactive features of Waave’s Services, when you choose to do so;
• contact you for your views on Waave’s Services and to notify you about changes or developments to
Waave's Service.
• administer the Site and the App, and for internal operations, including troubleshooting, data analysis,
testing, research, statistical and survey purposes.
• as part of Waave's efforts to keep the Site and the App safe and secure and for the prevention of fraud.
• measure or understand the effectiveness of any advertising Waave serves to you and others, and to
deliver relevant advertising to you.
• improve the Site and/or the App including tailoring it to your needs.
• use GPS to identify the location of users.
• comply with Waave's legal obligations.
• protect Waave's rights and interests.

Waave's third-party service providers may cross-reference your data with data it already holds (independently of Waave) to provide Waave with statistical analysis of the demographic of its users. Waave uses aggregated and anonymous analytics information for internal business planning and other similar purposes.

SECURITY AND DATA RETENTION

Waave has implemented administrative, physical and electronic measures designed to protect your information from unauthorized access. Waave will comply with applicable law in the event of any breach of the security, confidentiality, or integrity of your Personal Information and, where we consider appropriate or where required by applicable law, notify you via email, text or conspicuous posting on the Site in the most expedient time possible and without unreasonable delay, insofar as it is consistent with (i) the legitimate needs of law enforcement or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

Although guaranteed security does not exist either on or off the Internet, we make commercially reasonable efforts to make the collection and security of such information consistent with this Privacy Policy and all applicable laws and regulations.

Where Waave has given you (or where you have chosen) a username, login or password which enables you to access certain parts of the Site and/or the App, you are responsible for keeping this information confidential. Waave asks you not to share a username, login or password with anyone. Waave restricts access to your Personal Information to individuals who need access to it in order to process it on Waave's behalf. These individuals, where employees, are bound by confidentiality agreements and Waave will take appropriate action (which may include disciplinary proceedings) in the event Waave finds that its employee(s) has failed to meet standards in looking after your personal data. Waave cannot accept any liability for employees or agents acting outside its normal course of business, or for Drivers or any third-parties with whom your Personal Information may be shared who act outside of the terms of our contracts with them.

We will retain your Personal Information only for as long as necessary to fulfil the purpose(s) for which it was collected and to comply with applicable laws.

In general, this means that we store your data throughout the existence of your account with us or for as long as is otherwise required to deliver our Services, except where we have a lawful basis for saving it for an extended period of time (for instance, after fully executing a contract, we may still have a legitimate interest in using your contact details for marketing purposes). We also retain the data we need for the execution of pending tasks and the data we need to investigate and realize our legal rights and our claims, as well as certain data that we must store for a legally mandatory period of time. When certain data is only saved due to a legally mandatory preservation term, the processing of it by us is limited, even where you do not specifically request this.

DISCLOSURE AND SHARING OF YOUR INFORMATION

We know how important it is to keep your information confidential. We will not rent, sell or share your Personal Information with third-parties except as specifically approved by you at the time of disclosure or under the circumstances described in this Privacy Policy. If you do not want us to use or disclose Personal Information collected about you in the ways identified in this Privacy Policy, you may choose not to provide your Personal Information at any time or download the App and become a Passenger.

In addition to using the information collected by us for the purposes described above, we may also share your information as described below. Please review our sharing policy closely, especially with respect to your Personal Information.
Passenger and Drivers
We share certain information about Passengers (including but not limited to name, rating, pickup and drop-off locations, route information, profile picture) with Drivers to enable the scheduling and provision of Rides. Information provided on any online forum or message board may be viewed by any Passengers or Drivers who access the forum or board. We do not record any app to app calls between driver and passenger.

Service Providers
We also share Personal Information with vendors, payment providers, transportation providers, promotion companies, sponsorship companies, commercial software providers, consultants, market researchers and data processors who perform services on behalf of Waave, including without limitation, companies that provide route guidance, estimated times of arrival, email services and host the Website, App and Service. We also share Personal Information with third-parties that provide analysis, monitoring, and reports to assist us in preventing and detecting fraudulent transactions and other activity. Waave has selected companies who maintain high standards with respect to privacy and agree to use the Personal Information only to perform specific services on behalf of Waave and in accordance with the terms and conditions of this Privacy Policy.

Compliance with Laws, Law Enforcement and Safety
We may disclose information we have collected about you if required to do so by law or if we, in our sole discretion, believe that disclosure is reasonable to comply with the law, requests or orders from law enforcement, or any legal process (whether or not such disclosure is required by applicable law), or to protect or defend Waave's, or a third-party's, rights or property. We may also reserve the right to disclose information we've collected about you for purposes of protecting the health and safety of our Passengers and Drivers, such as in the case of risk of harm or violence against any person. Finally, we may also disclose information in order to enforce or apply our Terms and Conditions and other agreements; or to protect the rights, property, or safety of Waave, its customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Anonymous Information
Aggregated Anonymous Information is the combination of your Anonymous Information with the Anonymous Information of other users (“Aggregated Anonymous Information”). Aggregated Anonymous Information does not allow you to be identified or contacted. We may share such Aggregated Anonymous Information with third-parties, and, depending on the circumstances, we may or may not charge third-parties for such information, or limit the third parties' use of the same.

Business Transactions
We may share all or some of your Personal Information with any of our parents, subsidiaries, joint ventures, or other companies under common control, in which case we will require them to honor this Privacy Policy. Additionally, in the event we undergo a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets, including in the unlikely event of bankruptcy, your Personal Information may be among the assets transferred. You acknowledge that such transfers may occur and are permitted by this Privacy Policy, and that any entity that acquires us, is merged with us or that acquires our assets may continue to process your Personal Information as set forth in this Privacy Policy.

Third Party Marketing
Waave may disclose your information to carefully selected partners which Waave thinks may be of interest to you. These companies may contact you by post, email or phone for marketing or promotional purposes.
LOCATION OF YOUR INFORMATION

Waave will take appropriate steps to ensure that your Personal Information is treated securely and in accordance with applicable Privacy Laws and this Privacy Policy. This may include putting in place data transfer agreements or ensuring that Waave or third-parties comply with data transfer mechanisms or schemes.

YOUR RIGHTS

Subject to applicable law, you may have some or all of the following rights in respect of your Personal Information:

Access to own Personal Information: You may have the right to request an overview of your Personal Data in accordance with applicable law. In such a case, where reasonably possible, the overview shall contain information regarding the source (if reasonably available), type, purpose and categories of recipients of the relevant Personal Information. You may also have the right to obtain a copy of the Personal Information held about you. Such right of access can normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law, for instance where you request multiple copies of your information.

Accuracy and right of rectification: Waave seeks to ensure that your Personal Data is accurate, complete and kept up-to-date to the extent reasonably necessary for the purposes described herein. If the Personal Information is incorrect, incomplete or not processed in compliance with applicable law or this Policy, you may have the right to have your Personal Information rectified, deleted or blocked (as appropriate) in accordance with applicable law.

Right to object to or withdraw consent: In certain circumstances (e.g., where your Personal Information is processed on the basis of Waave's legitimate interests), you may have the right to object to the processing of your Personal Information on the basis of compelling grounds related to your particular situation and in accordance with applicable law. For instance, you may have the right to request that Waave does not process your personal data for marketing purposes. In such a case, you can control your initial marketing preferences by ticking the relevant box situated on the form on which your data is collected (the registration form). Thereafter, you can follow the opt-out links or unsubscribe directions in emails or SMS messages.

If the processing of your Personal Information is based on your consent, you may have the right to withdraw your consent to such processing at any time. It is worth noting that the withdrawing of consent has no impact on earlier processing on such basis and does not prevent Waave from invoking another legal basis for the processing of the relevant Personal Information.

Right to lodge a complaint: You may have the right to lodge a complaint before the relevant data protection authority or supervisory authority.

To exercise these rights, where applicable, please contact Waave at info@waave.co or use the appropriate functionality in the App or Site. In this context, Waave asks that you provide it with one form of photographic identification so that Waave can verify your identity. From time to time Waave may post links to third-party websites on the Site and/or the App. These links are provided as a courtesy to Waave's users and visitors and are not administered or verified in any way by Waave. Such links are accessed by you at your own risk and Waave makes no representations or warranties about the content of such websites including any cookies used by the website operator. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that Waave does not accept any responsibility or liability for these policies. As a result, Waave strongly recommends that you read the privacy policies of any third-party websites before you provide any personal data to them.
CHILDREN’S PRIVACY

We do not knowingly collect information from children under 13 and we do not want it. We will take steps to delete it if we learn we have collected it. No part of our Service is directed towards children under the age of 13 and we do not knowingly collect, maintain, or use Personal Information from children under the age of 13. If you learn that your child has provided us with Personal Information without your consent, you may alert us at info@waave.co. If we learn that we have collected any Personal Information from children under 13, we will promptly take steps to delete such information and terminate the child’s account, in compliance with the Children’s Online Privacy Protection Act (COPPA).

YOUR CALIFORNIA PRIVACY RIGHTS

California Civil Code Section § 1798.83 permits users of our websites that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes.

INTERNATIONAL USERS

By using the Service, you will transfer data to the United States. By choosing to visit the Service or otherwise provide information to us, you agree that any dispute over privacy or the terms contained in this Privacy Policy will be governed by the law of the state of New York and the adjudication of any disputes arising in connection with Via or the Service will be in accordance with the Terms of Use. If you are visiting from the European Union or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your information to the United States and processing globally. By providing your information, you consent to any transfer and processing in accordance with this Policy.

CHANGES TO WAAVE’S PRIVACY POLICY

Waave may change this Privacy Policy from time to time. Any changes Waave may make to this Privacy Policy in the future will be posted on this page and, where Waave deems appropriate, notified to you (usually by email). You are therefore invited to check it each time you send Waave Personal Information. The date of the most recent revisions will appear on this page.

CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to info@waave.co.

HOW TO RESOLVE COMPLAINTS

In compliance with the EU-US Privacy Shield Principles, Via commits to resolve complaints about your privacy and our collection or use of your personal information. If you have any questions about this privacy policy, the information that we collect from you, or the Services, please contact us at:

Waave Inc.
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