

## **BiblioVélo - Privacy Policy**

Thank you for taking the time to read the BiblioVélo privacy policy. Please read it carefully, as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

### **1. About Us**

This privacy policy relates to your use of our app BiblioVélo and its related website (the **app**) which is operated by Box Hill Ventures Ltd, an English company (reg no. 11580389) registered at 71 - 75 Shelton Street, London WC2H 9JQ (**we / our / us**). Our ICO registration number is ZA474196.

We collect, use and are responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation (**GDPR**) which applies across the European Union (including in the United Kingdom) and we are responsible as the 'controller' of that personal information for the purposes of those laws. The app is for adult use only and we do not knowingly collect or use personal information relating to children.

We are committed to protecting your privacy and the security of the personal data we hold and process on your behalf. This privacy policy explains how we collect information, what we use the information for, our legal basis for doing so, and what controls you have.

We may change this privacy policy from time to time. It was last updated on 12 November 2018.

### **2. What information do we collect from you?**

- a.** Information you give to us. We may collect and process the following personal information about you:
  - general personal details, which may include your name, address and contact details (including email and phone number) and your date of birth
  - account sign-in details, which will include the username and password you choose
  - your location, which may include your latitude and longitude or such other location identifying information as is determined by your device once you provide permission to share your location with us
  - information you provide to us via social media which may include personal data depending on the content of the information you provide, and
  - communications you send to us (by telephone, email or otherwise), for example, to report a problem or to submit queries, concerns or comments regarding the app, our service, or to provide general comments to us.

- b. Information we collect about you. Each time you use the app we may automatically collect the following information (which does not constitute personal data):
- technical information, including your IP address, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and device information
  - information about your use / visit, including the full connection protocol clickstream to, through and from the app (including date and time), bikes you've 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), and methods used to browse away from the page and any phone number used to call our customer service number
- c. Information we receive from others. We work closely with third parties (including, for example, service providers, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

### **3. What we do with your data?**

- a. We use it to provide our services to you. We need to process certain personal information in order to provide our services to you, which includes verifying the identities of renters of bikes, processing payments and for insuring ourselves as required to carry out our services effectively. In order to deliver our services, your personal data may also be transferred to the following third parties:
- our insurers including Yellow Jersey, so that we can continue to provide our guarantee to our users
  - third-party identity verification agencies including Onfido, in circumstances where we may need to verify your identity
  - payment service providers including Stripe and Paypal, to facilitate the payment of our fees and the pre-authorisation of incident fees,
  - our legal partners, including MTA Solicitors, to facilitate the resolution of disputes between owners and renters, and
  - our technology partners, including our cloud hosting provider Amazon Web Services, to store your personal data securely and Quickblox to deliver reliable real-time messaging services.
- b. To contact you about our services. We may use the contact details you have given us to get in touch with you about the services we offer such as by following up on an incomplete registration process or to email you details of offers you may be

interested in. You may opt out of this at any time by telling us, or if we have contacted you via email, you will be given an option to opt out by clicking the relevant email link.

- c. To improve our services. We may use your personal data to analyse how you are using the app and to gain insights into how we can improve our products and services.
- d. For customer support and account administration. We may use your personal data to provide you with customer support or to investigate complaints or concerns about your account.
- e. For related products and services. We may use your personal data to provide you with information on related products and services that you may be interested in, such as home contents insurance or utility providers. This information will be provided electronically, either via our website, app, or email. We will not transfer any of your personal data to third parties for this purpose unless you give us your explicit consent.

#### 4. **Our lawful basis for processing your personal data**

Under Article 6 of the EU General Data Protection Regulation (GDPR) we are required to tell you about the legal basis under which we collect and process your data. We will only collect and process your personal data in accordance with one of the below lawful bases:

- a. Performance of a contract. This is where the processing is necessary for a contract we have with you, or you have asked us to take specific steps before entering into a contract. This lawful basis covers the following purposes of providing our services to you.
- b. Consent. You may be given the option to explicitly consent to share your data with selected third parties for marketing purposes or to sign up for related products and services. This will be via a separate notice via the app. We will never assume that we have your consent unless you have explicitly opted in, and you can withdraw your consent at any time by contacting us.
- c. Our legitimate interests. This is where we collect and process data in accordance with our 'legitimate interests', which include:
  - improving our service
  - providing you with marketing information about our services, and
  - providing you with customer support and administering your account

- d. Compliance with our legal obligations. We may be required to process or share your personal data in compliance with a legal obligation, such as in response to a request by law enforcement or when investigating a civil claim.

## 5. **Data storage and international transfers**

We take the security of your data very seriously, and all of your personal data will be kept according to strict safeguards and in compliance with the GDPR. Your data will be stored on cloud servers within the EEA and we will only store your data outside the EEA in the event that the jurisdiction in question has been assessed as compliant with the GDPR.

## 6. **Your rights**

You have the right to be informed over what personal data we hold and how we are using it. This information is contained within this privacy notice.

If you have consented to particular uses of your personal data, you have the right to withdraw this consent at any time.

You have the right to “portability” of your personal data that we have collected with your consent or in performance of a contract. This means that you can request copies of all the personal data we hold for this purpose in a structured, commonly used, and machine readable form, and we will supply this to you free of charge on request. This can be requested via the app and will be emailed to you in CSV format as soon as possible following receipt of your request.

Where we are using your personal data in accordance with our legitimate interests, you can object to further use of your data. This objection should be based on grounds relating to your particular situation. If you object, we will stop using your personal data in this way immediately, unless there are compelling legitimate grounds for processing your personal data which override your interests, rights and freedoms (such as requests by law enforcement) or we need to process your data for the establishment, exercise or defence of legal claims. You may always object to further use of your data for direct marketing purposes by clicking the “unsubscribe” button within marketing emails.

You have the right to request a copy of the personal data we hold under the GDPR by making a “subject access request” to us in writing. We will comply with all valid subject access requests within 30 days, unless the request is particularly complex; in this case we will contact you within 30 days with further information. You will not be charged for making a subject access request unless we reasonably deem this to be a manifestly unfounded or excessive request, in which instance you will be charged a reasonable fee based on the administrative costs of providing the information.

If some of the personal data we hold is inaccurate or incomplete, you can request that we rectify our records by writing to us. We will comply with all requests within 30 days unless the request is particularly complex; in this case we will contact you within 30 days with further information.

You have the right to restrict the processing of your personal data in certain circumstances, such as when you object to us using your data in accordance with our legitimate interests or when you contest the accuracy of the data we hold on you.

You have the right to request erasure of the personal data we hold by contacting us. Please note that it is not always possible for us to comply with a request for erasure; for example, if we have collected data from you in performance of a contract, we cannot normally comply with a request for erasure unless we no longer have an active contract with you and the data is more than six years old. You can request erasure of the personal data that we are able to erase via the app.

You can exercise any of your rights by contacting us via the details at the bottom of this page, or where available and as described above, via the app.

#### **7. How long we will keep your data for**

We will only keep your personal data for as long as is necessary. This means that we will retain your personal data for as long as we have an active contract or business relationship with you, and after this, we will only keep your data for as long as is necessary for the purposes which it is stored.

#### **8. What happens if you don't provide us with the information we need**

As outlined above, some of the personal data you provide to us will be used in order to enter into a contract with you and to comply with our legal obligations. Should you not provide us with the data we require to offer our service or request that we erase the personal data we hold, it is likely that we will not be able to deliver our services to you.

#### **9. Complaints**

If you feel that we have not been complying with our obligations on data protection law or you wish to assert one of your rights, please contact us without delay using the contact details provided above or by email to [support@BiblioVélo.com](mailto:support@BiblioVélo.com).

Should you be dissatisfied with our response or wish to complain to the relevant supervisory authority, you can do so by contacting the Information Commissioner's Office (ICO). Contact details for the ICO can be found on [this webpage](#).