Privacy policy

Slivergroup, LLC (hereinafter, "CarGari", "Platform", "Service(s)", "we", or "us") is committed to privacy and wants you to be familiar with how we collect, use, process and disclose your information. This Privacy Policy covers your access or use of our websites and applications ("Platform"), when communicating with us or other CarGari users on any device collectively ("Services"), or when you otherwise provide us with information. Slivergroup, LLC acts as the data controller for the purpose of this Privacy Policy.

What We Gather From You

We collect three categories of information - information automatically collected from your use of the Services, information you give us; and information from third party sources.

Information you provide to us

Account information. When you register for an account with us, we require certain identifying information such as your name and email address.

Travel/Trip information. We collect information you provide in relation to a trip such as vehicle listing details, vehicle identification number (VIN), availability dates, reviews and uploaded trip photos.

Profile information. You may be asked to provide additional profile information to use certain features of the CarGari Service which may include street addresses, phone numbers, driver's license number and issuing country and/or state and date of birth. Certain parts of your profile (like your profile photos, employer, city, school and biography) are part of your public profile page and will be publicly visible to others.

Authentication information. There are instances where we may ask you to provide us a photograph and/or other demographic information, such as a scanned copy of a driver's license, passport, or credit/debit card, last four digits of your Social Security number, social insurance number, social media account information, driver's/motor vehicle record, insurance information, and other forms of identification. Where we request that you withhold certain information when providing us with personally identifiable information (such as concealing or redacting all but the last four digits of your payment card number), please do so.

Payment information. We gather your financial information (like your bank account or payment card numbers) in connection with a potential or actual transaction, which may be stored by one or more third party payment services providers or digital payments companies that may be located inside or outside of your country of residence including outside the European Economic Area (EEA).

Communications with CarGari and CarGari users. When you communicate with CarGari, whether via email, phone or chat, or use the Services to communicate with other users, we collect information about your communication and any information you choose to provide.

When you use or access our Services we automatically collect this information

Usage data. We collect information about your interactions with the Platform, such as the pages or other content you view, your searches, bookings you have made and other actions on the Platform.

Log data. We automatically collect log information when you use the Platform, even if you have not created a CarGari account or logged in. That information includes, among other things: details about how you've used the Platform, IP address, length of stay, frequency of visits, hardware and software information, device information, device event information (e.g., crashes, browser type) and the page you've viewed or engaged with before [or after] you've used the Platform.

Location information. When you use certain features of the Platform, we may collect information about your location (e.g., IP address) or more specific location information (e.g., more precise location information from your mobile device). Keep in mind that most mobile devices allow you to control or disable the use of location services by any application on your mobile device in the device's settings menu.

Travel/Trip information. We collect information related to your transactions on the Platform, including the date and time, amounts charged and other related trip details.

Cookies and like technology. When you access our Platform, we (including companies we work with) may place small data files on your computer or other device. These data files may be cookies, clear gifs, pixel tags, e-tags, "Flash cookies", or other local storage provided by your browser or associated applications (collectively "Cookies"). At this time, we do not respond to browser 'Do-Not-Track' signals.

Information we collect from third party sources.

Third party services. If you choose to log in to our Services through social media sites (e.g., Facebook or Google), the third-party service may send us information such as your registration and profile information from that service. The information we may receive varies by site and is controlled by that site. By associating an account managed by a third party with your CarGari account and authorizing CarGari to have access to this information, you agree that CarGari may collect, store, and use this information in accordance with this Privacy Policy. We are not responsible for how those third parties use and share your information. Please refer to those third parties' privacy policies to understand how they use and share your information.

Third party in-vehicle devices. If your vehicle, or a vehicle you book through the Services, includes an in-car device operated by a third-party service or installed by the Presenter, that Presenter or service may record information about your use of the car. The Presenter and third-party service will be solely responsible to you for its use of such information but may disclose such information to CarGari.

Background information. To the extent permitted by applicable laws, CarGari may obtain reports from public records of criminal convictions or local versions of background or registered sex offenders checks. We may use your information, including your full name and date of birth, to obtain such reports.

Other sources. To the extent permitted by applicable law, we may receive additional information about you, such as demographic data, fraud detection information or data from credit bureaus from third party service providers and/or partners and combine it with information we have about you.

Ways in which we use what we collect

We use, store and process your information to provide and better our Services and ensure a secure, safe and trusted experience. For example, we may use your information to:

Provide and improve our Services

- provide customer support
- send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you and contact you at any telephone number, by placing a voice call or through text (SMS) or email messaging, as authorized by our Terms of Service
- enable the processing of transactions and send notices about your transactions
- enable you to access and use the CarGari Services
- if you provide us or our service providers any information relating to other people in connection with the Services, we may use and store this

information to facilitate your referral invitations; send your requests for reviews, for fraud detection and prevention and for any purpose you authorize at the time of collection

- improve the Services, including by personalizing or customizing your user experience
- measure the performance of the Services and improve our content and layout
- enable you to communicate with other CarGari users, including by sending them messages or other information during the booking process

Ensure a safe, secure and trusted experience

- verify your identity or authenticate information provided by you, including during account creation and password reset processes
- resolve disputes, collect fees, and troubleshoot problems
- detect, prevent, and/or remediate fraud, abuse, security incidents or other potentially harmful, prohibited or illegal activities
- determine your likelihood of getting into an accident or of making an insurance claim, such by checking your auto insurance score
- using information from your device to identify unsafe driving behavior, including speeding or harsh braking and acceleration, and to raise awareness regarding such behaviors
- detect, prevent or remediate violations of and enforce our Terms and Policies
- manage and protect our information technology infrastructure
- conducting investigations and risk assessments
- conduct checks against databases and information sources (such as but not limited to public government databases)

In this regard, we may do any or all of the foregoing with or without further notifying you as permitted by applicable law;

Provide and better our Services

- provide targeted marketing, provide service update notices, and deliver promotional offers based on your communication preferences
- perform creditworthiness and solvency checks, compare information for accuracy, and verify it with third parties
- administer referral programs, surveys, contests, rewards, or other promotional activities or sponsored events

We retain your information as long as it is reasonably necessary and relevant for our operations, legal obligations or other purposes.

Disclosure

With consent

You may direct us to share your information or consent to it as described at the time of sharing, such as when you authorize us to send to a third party marketing partner.

Profiles, listings and other public information

Your public listing page will always include some basic information, such as your user ID/name associated with your account, your public profile photo, and for Presenters, the city where your car is located, your listing description, your calendar availability, transaction related information to allow our community to evaluate your reliability and responsiveness, and reviews/feedback. Your public listing page may also include aggregate demand information (such as number of page views over a period of time) and information about your cancellations. Our Services may also display the approximate geographic pick-up location on a map of the owner's vehicle.

Our Services allow your public profile and public listing pages to be included in search engines, in which case your public profile and public Listing pages may be indexed by search engines and may be published as search results.

Sharing between Presenter and Receiver

CarGari enables car owners to offer and share their vehicles with other individuals. If you agree to a booking through the Services, we may provide your information to the other party in that transaction as reasonably necessary to facilitate the transaction. As an example, CarGari may provide your mobile phone number and/or driver's license information to facilitate communication or your photograph to facilitate identification. We will provide the address of the vehicle and/or the proposed delivery location. We may also share user-uploaded "Trip Photos" with captions with the other party involved in the reservation. CarGari users engaged in a booking with you may send you text message (such as to confirm pickup or delivery location). Standard telephone minute and text and data charges may apply.

Service providers

CarGari may share Information with vendors and service providers who are engaged by, or working with, us in connection with the processing of payments, operation of our Services and customer support functions and who need access to such information to carry out their work

for us. In some cases, the service provider may be directly collecting the information from you on our behalf. These service providers may be located inside or outside your country of residence, including outside the EEA. For Presenters who choose to use our photography program, should we provide such a service; your contact information will be shared with the photographer assigned to shoot your vehicle. These providers have limited access to your information to perform these tasks on our behalf and are contractually obligated to use it consistent with this Privacy Policy.

Aggregated data

CarGari may compile aggregate information about the use of the Services. In other words, information about how you use a service may be collected and combined with information about how others use the same service. Aggregate data helps us understand trends and our users' needs so that we can better consider new features or otherwise tailor our Services. CarGari may also share aggregate demographic information with advertisers and partners. This policy in no way restricts or limits our collection and use of aggregate information that does not identify any individual.

Responding to Legal Requests, Preventing Harm, and Protecting our Rights

We may disclose your information to courts, law enforcement, governmental or tax authorities, or authorized third parties. We will make such disclosure to the extent we are required or permitted to do so by applicable law or if such disclosure is reasonably necessary to comply with our legal obligations or legal process and to respond to claims asserted against us. We may also disclose your information in response to valid legal requests relating to criminal investigations or alleged or suspected illegal activity or any other activity that may expose CarGari, you, or any other user to legal liability or to protect the rights, property, or personal safety of CarGari, our employees, our users, or members of the public.

Your preferences and choices

Correct and update

You can review, correct, update, and edit certain information that has been previously provided to us by you at any time by logging in to your account and reviewing your account settings and profile. You can also access or request a correction of your information by contacting us at support.CarGari.com. For your protection, we may need to verify your identity before implementing your request.

Account closure

If you wish to close your account and request deletion of your personal information, please send an email to accountclosure@CarGari.com.

Please note that we may be unable to delete information to comply with applicable laws, detect or prevent fraud, collect any fees owed, resolve disputes, assist with or process claims, troubleshoot problems, assist with any investigation, comply with audits and investigation, to enforce our <u>Terms of Service</u> and Policies and take other actions reasonably necessary, permitted, or required by applicable law. There may also be residual information that will remain within our databases and other records, which will not be removed.

Security

We have endeavored to put into place reasonable security measures in an effort to protect information against unauthorized access, destruction, or alteration while it is under our control. However, no method of transmission over the Internet, and no method of storing information, can be 100% secure. So, we cannot guarantee the absolute security of your transmissions to us and of your information that we store.

Important information

This section describes some additional important privacy information related to your use of our Services.

Change of ownership

If we merge with or are acquired by another company, we may share information with them in accordance with our privacy standards and applicable law.

Sensitive information

We ask that you not send us, and you not disclose, any sensitive information unless specifically requested (e.g., Social Security numbers, social insurance numbers, passports, information related to racial or ethnic origin, political opinions, religion, trade union membership or other beliefs, health, biometrics, or genetic characteristics) and subject to applicable law on or through the Services or otherwise to us.

Children's privacy

Our websites are general audience websites, and our Services are not intended for anyone under the age of 21. We do not knowingly collect information from users under the age of 21. If a child has already provided us with information, his or her parent or guardian may contact us for the purpose of deleting this information or closing an account.

Third party privacy practices

This Privacy Policy addresses only the use and disclosure of information collected by CarGari. This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any site or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates. If you disclose your information to others, or if you are directed to a third party website, their privacy notices and practices will apply.

Signed in

If you sign in to our Platform using an email address and password, your session will expire after 30 days unless you log out but if you sign in through a social network login such as Facebook or Google, you will stay logged on/signed in until you explicitly sign out of your account or clear your Cookies. If you are using a public or shared computer you should sign out and/or clear your Cookies when you are done using our Platform in order to protect your account and your information. If you do not sign out, you or any other user of the computer/browser you signed in on will be able to view and access your account, including your social media accounts.

Changes to this privacy policy

We may change this Privacy Policy. Please take a look at the "Last revised" legend at the top of this page to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the Services. Your use of the Services following these changes means that you accept the revised Privacy Policy. If you don't agree to these changes, you can contact us to close your account and you will only be bound by the prior version of the Privacy Policy.

Contact

CarGari welcomes your questions and comments about privacy, and what we do. Please feel free to contact us at our address in the Questions/Comments.