

**Privacy Policy****INTRODUCTION**

This Privacy Policy concerns MooV Corporate Pty Ltd (ACN 639 337 554) (**MooV**) as the parent company of MooVr (Australia) Pty Ltd (ACN 639 402 341) (**MooVr**).

This Privacy Policy applies to any user of the services provided by MooVr, and to anyone else who contacts MooVr or otherwise submits information to MooVr.

This Privacy Policy covers:

1. what personal information we collect about you and how it is collected;
2. why we collect personal information and how we use it;
3. cookies;
4. location services;
5. communications;
6. other third party platforms, including social media, and linked sites;
7. surveys;
8. disclosure of personal information;
9. storage and security;
10. direct marketing – and how to opt out of receiving direct marketing communications;
11. retention of personal information;
12. exemptions;
13. changes to the Privacy Policy; and
14. questions, feedback and complaints.

**1. WHAT PERSONAL INFORMATION WE COLLECT AND HOW**

The type of personal information we collect and how depends on who you are and in what capacity you are dealing with us, for example whether you are a driver, a passenger, corporate client or business or someone else. Listed below are some examples of the types of information collected by MooVr and their sources.

- Personal information from your account registration such as your name, age, gender, address, email address and mobile number.
- Information in relation to third parties if you provide that information to us, for example the name and telephone number of your emergency contact. In supplying information about third parties, you consent to us collecting, holding and using their personal information.
- When registering as a driver, we will collect additional information about you to verify your identity and establish your suitability as a driver.
- When registering as a driver, we will verify your criminal history and complete background checks (directly or by a third party on our behalf).



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- Facial images for driver accounts and some passenger features will be used to verify your identity.
- Trip details relating to your geographical location, date/time, departure and destination information, trip duration and distance travelled.
- Details of the device on which the MooVr Apps are installed or accessed.
- Details about your preferences and settings.
- Your experiences related to our services and/or other user generated content, including from other individuals about you, such as ratings, complaints, compliments or comments.
- Personal information collected and held via financial or third party payment systems about payment mechanisms/methods that are related to the services are securely stored.
- Your connection/relationship to other individuals whose personal information we may collect or hold.
- Details about your participation in any MooVr gift card programs linked or available through MooVr or any related body corporate, business partner or affiliate of MooVr.
- Any information that you allow that social media/other third party platform to share with us. Please see section 6 below for more information.
- Information provided in response to surveys. Please see section 7 below for more information.
- If applicable and reasonably necessary, your health information in connection with a pandemic as declared by the World Health Organisation or other equivalent organisation. This will be pandemic specific but may include photos of drivers, passengers and other third parties to ensure that appropriate personal protective equipment is being worn.

## 2. WHY WE COLLECT YOUR PERSONAL INFORMATION AND HOW IT IS USED

At a high level, MooVr collects personal information about you to enable us to provide booking services, facilitate the provision of passenger transportation and delivery services, inform you of different product offerings and in order to comply with our legal and regulatory obligations.

Personal information is collected and used in the course of our normal business operations and activities, including the following purposes:

- (a) to facilitate the provision of transportation and delivery services to you and for you;
- (b) to provide receipts for transportation and delivery services to your account;
- (c) to provide Tax Invoice and earnings reports to driver partners;
- (d) to communicate with you and facilitate communications between users;



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- (e) to authenticate/verify your identify and/or immigration status (depending on the capacity in which you have engaged with MooVr);
- (f) to ensure and enhance the safety and security of users;
- (g) to provide customer support;
- (h) to process and facilitate payment for goods and services;
- (i) for research and development;
- (j) to notify you of any important information;
- (k) to conduct marketing, promotions and advertising;
- (l) to deal with disputes and complaints;
- (m) to claim our rights in legal proceedings;
- (n) to investigate and prevent fraud and any other illegal activity;
- (o) to comply with laws, including assisting government agencies and law enforcement investigations;
- (p) to report to regulatory authorities or government bodies on regulatory compliance;
- (q) to use or disclose it in accordance with this Privacy Policy.

### 3. COOKIES

Cookies are small text files that MooVr sends to a user's device. The text file collects information about user actions on your site. Cookies allow MooVr to:

- (a) verify users;
- (b) remember user preferences and account settings;
- (c) determine the popularity and demand for services;
- (d) deliver and measure the effectiveness of promotional campaigns;
- (e) analyse user traffic and trends; and
- (f) generally understand the behaviours of users.

In other words, it is a way for us to enhance and improve functionality. Cookies by themselves cannot be used to find out the identity of any user.

MooVr uses cookies, and other similar technologies, on our applications, websites, emails and online advertisements. You can prevent the collection of information by disabling (i.e. turning off) cookies.

### 4. LOCATION SERVICES

Location services are fundamental to the MooVr Apps use. Before using the MooVr Apps for the first time, we will ask you to choose whether to allow MooVr access to your location and in what circumstances. You may change these settings at any time on your device. With your consent, we will obtain your location through IP address, GPS, and other sensors that provide necessary information for the provision of transportation and delivery services.

We use the information primarily so that we can recommend pick-up points based on a passenger's approximate location. The information collected will be encrypted before being sent to any related body corporate, business partner or affiliate of MooVr where it may be de-identified and aggregated for storage, research and analytical purposes. See section 9 below for more information about storage and security.



## 5. COMMUNICATIONS

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The MooVr App allows passengers and drivers to contact each other via call or message anonymously once a booking service request has been accepted to facilitate the provision of transportation and delivery services.

We may record communications (voice and text) made and received through the MooV App.

Recorded communications may be used for safety, quality assurance, data analysis, customer service, policies and procedures verification, to investigate and deal with disputes and complaints and for any other purpose, in accordance with this Privacy Policy.

## 6. OTHER THIRD PARTY PLATFORMS, INCLUDING SOCIAL MEDIA, AND LINKS TO OTHER SITES

MooVr uses third party social and business platforms for interactive information sharing and to connect with users. Information shared on third party platforms are subject to the privacy policy displayed by the third party platform.

MooVr Apps and communications from MooVr may contain links to other internet sites. While MooVr takes appropriate care in using third party platforms and publishing links to any other sites, you decide whether or not to access such links or accept such services.

MooVr gives no undertakings or warranties with respect to the accuracy, completeness, adequacy and reliability of any information, data, opinions, pictures, statements or suggestions provided by linked sites or other third party platforms.

It is important that you read carefully any terms and conditions (including any privacy statements or policies) of any third party platform or internet site relating to the handling and management of your personal information as they may use your personal information in ways and for purposes that will be different to the way that MooVr uses and discloses your personal information.

MooVr has no control over and will not be responsible for any third party platform or linked internet site that might breach your privacy.

## 7. SURVEYS

We may share surveys to collect data for the potential of business and applications service improvements. By choosing to participate in a survey, we may collect demographic information about you, including your age, your relationship status, your ethnicity, your profession/occupation and income, and other personal information. We may also collect information about the way you use, and your experiences of, our services.

By participating in any survey, you consent to us collecting and using any personal information that you provide, in accordance with this Privacy Policy.

## 8. DISCLOSURE OF YOUR PERSONAL INFORMATION



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MooVr may disclose your personal information to any related body corporate, business partner or affiliate of MooVr, any service provider we engage to help us provide our services or conduct data processing on our behalf or any external agency.

Your personal information may be disclosed for any of the purposes outlined in section 2 above.

Certain personal information may be automatically shared:

- in relation to a passenger, to the passenger's emergency contact or emergency services, upon activation of the alarm function; or
- in relation to a driver, to the driver's emergency contact or emergency services, upon activation of the alarm function.

Subject to any limitations in your settings, we may disclose your personal information:

- (a) to other users, to provide booking services and facilitate the provision of transportation and delivery services;
- (b) between a driver and passenger if we believe that a genuine dispute has arisen in connection with the provision of transportation or delivery services;
- (c) with other passengers where the split fare function is used, we may disclose the fact that you have made a split fare payment and the amount of the payment to those other passengers that booked the transportation services with you,
- (d) to insurers;
- (e) with your consent;
- (f) as permitted or otherwise authorised by this Privacy Policy;
- (g) in accordance with the Australian Privacy Principles and the *Privacy Act 1988* (Cth) (**Privacy Act**); and
- (h) as otherwise required by law.

Your personal information and privacy settings can be updated at any time in the MooVr Apps.

### 9. STORAGE AND SECURITY

MooVr is committed to ensuring that your information is and remains secure in Australia. We hold the personal information we collect on encrypted servers in electronic databases which are located in Australia and managed by our related entities and/or service providers.

If we become aware of an eligible *data breach* that has caused or is likely to cause serious harm (as defined in the Privacy Act), we will notify the relevant authorities and affected individuals, as required under the Privacy Act.

### 10. DIRECT MARKETING – HOW TO OPT OUT

With your optional consent, MooVr uses your personal information to provide you with information on products, services that we, or third parties offer, competitions and other marketing information that we consider may be relevant to you or that you might be interested in, even after you cease acquiring products or services from us. You consent to us sending you such information including by means of telemarketing, email, SMS and other digital channels.

If at any time you decide that you do not want to receive marketing communications from us, please:



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- click the “*Unsubscribe*” button in either the marketing email or message (as applicable); or
- email us at [support@moovr.me](mailto:support@moovr.me).

If you opt out of receiving marketing communications from us, we may still contact you for non-promotional reasons when providing services to you.

### 11. RETENTION OF PERSONAL INFORMATION

If you delete your account, we will retain your personal information in accordance with our record keeping policies and obligations as a booking service provider or transport service facilitator (as applicable).

MooVr may retain your personal information after you have requested us to delete or de-identify your information if:

- there is an unresolved issue relating to your account, such as an outstanding credit on your account or an unresolved claim or dispute;
- we are required to by any applicable law; and/or
- any information if necessary for our legitimate business interests, such as fraud prevention and enhancing users’ safety and security.

When such personal information is no longer required, we will take reasonable steps to delete the personal information from our systems or de-identify the personal information.

### 12. EXEMPTIONS

Where the Privacy Act allows for an exemption to compliance with certain obligations, we may rely on such an exemption.

### 13. CHANGES TO OUR PRIVACY POLICY

From time to time and for any reason, we may revise, amend or modify this Privacy Policy and our information handling practices. If we make material changes to this Privacy Policy, we will notify you of the changes through the MooVr Apps or by other means, such as by email.

We encourage you to review this Privacy Policy regularly to ensure you are familiar with it. The policy is published on our website at [insert] and also available in the MooVr Apps [under the settings menu].

### 14. QUESTIONS, FEEDBACK AND COMPLAINTS

At MooVr, we welcome any questions and feedback and are committed to taking complaints seriously.

If you have any questions about this Privacy Policy, or want to provide any feedback or make a complaint, please do not hesitate to contact us at [support@moovr.me](mailto:support@moovr.me)

Please be aware that we may need to verify your identity or request information from you before we can respond to you.