

# Privacy Policy

Via Mobility LLC (“We”, “Us”, “Our”) has developed a mobile application (“On Demand Transit”, “App”) that collects data from your device in order to provide you with pertinent transport information for nearby services.

## **1. CONSENT**

By using On Demand Transit, you accept the terms and conditions described in this Privacy Policy.

## **2. PURPOSE**

This Privacy Policy describes how we collect, use and disclose your information and how this information can be accessed and deleted when necessary.

## **3. SCOPE**

On Demand Transit may contain links to websites, apps, products or services that are operated by third parties (such as Uber). This Privacy Policy does not extend to these third parties on which we have no control and for which we cannot be held liable. We encourage you to read about the privacy policies, procedures and practices of those third parties.

## **4. WHAT INFORMATION WE COLLECT FROM YOU**

We collect and process information from your device in several ways, including:

- Once you have given us your consent to track your location, we keep track of your location and movement, including your latitude, longitude, time and speed of travel.
- The collection of location data only happens while On Demand Transit is in the foreground (unless explicitly stated otherwise by Transit) and if you've granted On Demand Transit access to your device's location services.
- We collect your preferences, including favorite routes, saved locations, GO stats and other personal customizations such as the "Minimize Walking" option or disabled transit networks, and give you the option to save such information to a On Demand Transit account by providing us your name and email address.
- We also automatically collect usage details each time you use On Demand Transit, including the country of origin, the searches you make, the routes you interact with, the type of phone or OS you are using, etc.
- We collect your name, phone number, email address and other information you may provide when using the "Send Feedback" feature in the Settings view. When using that option, a "debugging info.txt" file is automatically attached to the email body and contains contextual information (such as your current location, device type, OS version, etc.) that help us address issues you may be reporting.
- We collect contact information (email and/or push notification token) when you explicitly request to be notified when On Demand Transit supports a new market.
- When booking or purchasing mobility services directly from Transit (ridehail, bikeshare, carshare, transit tickets) in supported cities, we may collect your name, phone number, zip/postal code, email address, physical address, payment information, and other elements necessary to complete a transaction.

## **5. HOW WE USE YOUR INFORMATION**

We may use information collected from or provided by you for the following purposes:

- Provide you with pertinent transport information for nearby services;
- Understand your preferences so that we can customize On Demand Transit for you, such as recommending personalized transport options;
- Restore your preferences if you log into your On Demand Transit account on a different device;
- Measure usage of On Demand Transit, including usage of specific features and views;
- Offer you rewards such as credits or promo codes for mobility operators that are available in On Demand Transit;
- Generate real-time location data of transit vehicles and broadcast the vehicle location and predicted arrival times to other users;
- Securely transfer your usage details, payment information and user credentials to mobility operators to provide you access to their services;
- Develop and improve On Demand Transit based on your feedback and interactions;
- Guide product development and build new features;
- Conduct research on users habits and how they use public transportation;
- Identify and correct bugs and other problems with On Demand Transit;
- Respond to your emails and help with support queries;
- Subject to your consent, keep you posted from time to time on latest announcements and additional information;
- Comply with law and regulations and lawful requests or orders.

## **6. USERS' OPTIONS**

The following are some examples of your options with regard to collection, use and disclosure of your information:

- You can stop all collection of location data easily and at any time by disabling location services in your device's settings or by uninstalling On Demand Transit.
- You are not required to indicate any preferences (including setting your home and work address) in order to use On Demand Transit, nor are you required to create an On Demand Transit account that records your email, since these are optional.
- You can provide anonymous feedback by using an email account that does not reveal your identity, and does not include your name. You can also manually remove the "debugging info.txt" attachment file from the email's body if you do not want to share such contextual information with us.
- You can unsubscribe at any time from mailing lists announcing newly released cities by clicking the "Unsubscribe" link in the emails you may receive.

## **7. DISCLOSURE TO THIRD PARTIES**

We do not disclose your information to third parties without your explicit consent except for the following purposes:

- In case you request assistance with the use of On Demand Transit, we might share such request, including your contact information, with a third party directly involved in the issue (i.e. if you inform us over email that certain transit schedules in the app are outdated, and we forward this message to the applicable transit agency).
- When you purchase or access services from a third party (e.g. a mobility operator) through our app, we will share the information required to ascertain your lawful use of those services (including tokenized payment information, relevant personally identifiable information, and any relevant location data). For example,

if you purchase a public transit ticket, we may share the time and location where you purchased that ticket in order to ensure that no fraudulent tickets have been sold; or if you try to unlock a bikeshare bike, we may verify your location to ensure that you're near the station before you unlock a bike.

- In case of a prospective business transaction, you agree that On Demand Transit may disclose anonymous and aggregate information to another corporation in order for the parties to determine whether to proceed with such transaction. In case a business transaction is completed, you agree that any information may be transferred to the corporation that owns On Demand Transit or the relevant part of it in order to carry its business. A "business transaction" includes, but is not limited to, a reorganization, merger, purchase, sale or other acquisition or disposition of a corporation or any of its assets.
- In case we are required to comply with applicable law and regulations and lawful requests or orders or if it is otherwise permitted by law (i.e., protect and defend our rights, situation that threatens life, health or safety, etc.).

We also disclose anonymous and aggregate information to certain third parties for research, product development or other business purposes. For instance, we may share information with transit agencies to help them analyze and improve their services.

## **7.1 THIRD PARTY SOFTWARE/SERVICE**

While using On Demand Transit, we may be using third party software and/or service for various needs, inter alia, in order to collect and/or process the information detailed herein (the "Third Party Service Provider"). Note that these are independent software and/or service providers and we do not take any liability about the information collection policies of these providers, or about any kind of issue, legal or otherwise, relating thereto.

We may also provide additional transit-related services, including on-demand transit services, provided by our third party operational service partners (as they may evolve

from time to time at our discretion). Such third party providers' services include Uber and any other party, all of which are subject to a respective terms of use and privacy policies.

## **8. SECURITY SAFEGUARDS**

We are committed to securing your information and we take reasonable physical, organizational and technical measures to protect your information against unauthorized access, use, disclosure, modification or destruction.

These safeguards include, but are not limited to:

- Storage on secure servers;
- Encryption of the communication channels;
- Limited access to employees and contractors on a “need-to-know” basis.

Although we take great efforts to protect your information, no security system can prevent all potential security breaches nor be immune from any wrongdoings or malfunctions.

## **9. RETENTION PERIOD**

We will retain your information as long as you use On Demand Transit and for a reasonable time thereafter.

## **10. RIGHT TO ACCESS AND REMOVAL**

We store your information on servers located in the United States of America.

If you would like to remove or access any information that we have collected through Transit that is stored on our servers, please contact us at [support@ridewithvia.com](mailto:support@ridewithvia.com).

On receiving such a request, we will use reasonable efforts to provide you or delete such information.

## **11. CHILDREN**

We do not knowingly collect, use or disclose information from children under the age of 13. If we learn that we have collected information of a child under 13 without first receiving parental consent, we will take steps to delete such information within a reasonable time. If you have reason to believe that a child under the age of 13 has provided information to us, please contact us and we will take steps to delete such information within a reasonable time.

## **12. DO NOT TRACK SIGNALS**

On Demand Transit does not respond to Web browser “Do Not Track” (DNT) signals or other similar mechanisms.

Third parties do not collect information about your online activities over time and across different Web sites when using On Demand Transit.

## **13. RIGHTS OF EUROPEAN DATA SUBJECTS**

If you are in one of the EU/EEA countries, you are be entitled to certain rights under the General Data Protection Regulation (GDPR).

By using On Demand Transit or communicating with us, you consent to the purposes for which we process your personal data. We may process your personal data if we have other lawful grounds to do so.

You have a right to:

- Withdraw consent to processing, where consent is the basis of processing.

- Access your personal data that we hold and how to process it, under certain conditions.
- Demand rectification of inaccurate personal data about you.
- Object to unlawful data processing under certain conditions.
- Require erasure of past data about you (your "right to be forgotten") under certain conditions.
- Demand that we restrict processing of your personal data, under certain conditions, if you believe we have exceeded the legitimate basis for processing, processing is no longer necessary, are processing, or believe your personal data is inaccurate.
- Port personal data concerning you that you provided us in a structured, commonly used, and machine-readable format, subject to certain conditions.
- Complain to a data protection supervisory authority in your country.

The personal data we collect is not used for automated decision making and profiling, except for automated processes in the context of marketing. As stated above, you can opt-out of our direct marketing under certain conditions.

Our representative in the EU for the purposes of compliance with the GDPR can be contacted at: [support@ridewithvia.com](mailto:support@ridewithvia.com).

To learn more about your rights under the GDPR you can visit the [European Commission's page on Protection of Personal Data](#).

## **14. UPDATE**

We reserve the right to amend or change this Privacy Policy at any time without notice. In case of substantial changes to this Privacy Policy, we will alert you through our social media accounts within 30 days before such changes enter into effect. We will also update the privacy policy within the app on the date that such changes

become effective. By using On Demand Transit, you agree to be bound by the version of the privacy policy displayed on the date upon which you use the app. If you do not accept the amended or changed Privacy Policy, you may not access, use or continue to use On Demand Transit. By continuing to access and use On Demand Transit, you are acknowledging your acceptance of the amendments and changes. In any case, we recommend that you consult this page regularly in order to be informed of any changes in this Privacy Policy.

When we post changes to this Privacy Policy, we will revise the "last updated" date at the end of this Privacy Policy.

## **15. CONTACT INFORMATION**

If you have any questions or concerns about this Privacy Policy, please contact us by email at [support@ridewithvia.com](mailto:support@ridewithvia.com). We will examine and reply to all communications within reasonable delays.

This Privacy Policy was last updated on September 1<sup>st</sup>, 2019.