

Privacy policy

Effective as of February 1st, 2024.

We are fully aware of the importance of your privacy and we implement data protection rules seriously. Our main goal is to assure you a smooth and safe online experience while using our Platform. This privacy policy ("**Privacy Policy**") informs you about how we collect, store and process your Personal Data (as defined below).

We invite you to carefully read our Privacy Policy that supplements the [Terms](#) and the [Cookies Policy](#).

All capitalized terms have the same meaning as defined in the Terms and/or the Cookie Policy.

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1. When and what Personal Data do we collect from you?

Personal Data covers any information:

- relating to an identified or identifiable natural person (e.g. *your name, your address,..*);
- allowing us to identify you directly or indirectly, in particular by reference to an identification number (e.g. *your IP address*).

“**Personal Data**” includes both the data that you provide to Getaround and the data collected by Getaround via the use of Cookies, according to its Cookies Policy.

Your Personal Data will be collected and processed by Getaround in the following circumstances:

1.1. When you create an Account on our Platform

You can create your Account directly on the Platform or via your Apple, Facebook or Google account. You will then need to submit the following Personal Data to finalize your Account (the “**Account Data**”):

Mandatory

- Full name;
- Date and place of birth;
- Information of your driving license: *number, first issuance date and state or country of issuance*).
- Email address;
- Password;
- Telephone number;
- Postal address;
- If you register as a legal person: *the company name, registration number, VAT number and all the information above on the legal representative*.

Optional:

- Profile picture;
- Biography;
- Twitter link;
- Linkedin link.

1.2. When you are surfing on our Platform

In addition to other Personal Data you may have already provided to us, when you are surfing on our Platform, Getaround may collect the following Personal Data:

Server-Log-Files & Browsing Data (“ Website Data ”)	<ul style="list-style-type: none">• How you used the Platform, such as your search queries;• Your IP address;• Device-related event data that you use, such as crashes, your browser type and language, date and time of the request, and referring URL.
App Data	<ul style="list-style-type: none">• User-ID;• Android device ID or iOS IDFA;• IP-address;• Name of the operating system and version;• Country code;• Language;• Device name.
Cookies	<p>The following cookies may be collected according to our Cookie Policy :</p> <ul style="list-style-type: none">• Functional cookies• Non-functional cookies : audience analysis cookies, performance cookies, advertising personalisation and improvement cookies (optional)

1.3. When you rent out your Vehicle

In addition to other Personal Data we may have already collected, when you want to rent out your Vehicle you shall submit the following Personal Data:

Vehicle Data	<ul style="list-style-type: none">● Vehicle type and brand;● License plate numbers;● Address of the parking location;● Country, state and year of first registration;● Date of the last technical inspection;● Details about the Vehicle (e.g. number of seats and doors, accessories, tank size, mileage, fuel type).	In addition to the Data listed here on the left, for Owners part of the Drive with Uber Program: <ul style="list-style-type: none">● Copy of the Vehicle registration card● Copy of the Vehicle inspection
Owner Payment Data	<ul style="list-style-type: none">● Bank account details : <i>name of account owner and bank account numbers</i> <p>According to customer due diligence imposed by the financial and monetary code to Stripe, Getaround will conduct an identity check of you when you have made a cumulative income of \$1000 through renting out Vehicles.</p> <p>In this case, you must send to Getaround as soon as possible:</p> <ul style="list-style-type: none">● a valid copy of your identity documents;● a copy of the registration certificate of your Vehicle(s);● a proof of address dated less than 3 months	

1.4. When you rent a Vehicle

In addition to other Personal Data we may have already collected, when you want to rent a Vehicle you shall submit the following Personal Data:

1.4.a. For the Vehicle booking

When you book a Vehicle you need to submit the following data : (“**Driver Payment Data**”)

- First and last name of the cardholder;
- Details of the payment card: as soon as they are collected, they are immediately sent to our payment provider Stripe and Getaround does not have the full information - only the first six and last two numbers of the credit card are held by Getaround.

1.4.b. For your identity verification

You shall submit in addition to other Personal Data you may have already provided to us, the following information taken via our App on your smartphone (the “**Vetting Data**”):

- Photo (front and back) of your driving license;
- Photo of your I.D. card (only if you have a paper driving license or a non E.U. driving license);
- a video of you reading three numbers and turning your head.

If any of the Vetting Data is unclear or unsuitable, additional documents and/or information can be requested by us depending on why your identity verification was rejected (*e.g. copy of your identity document (I.D. card or passport), a selfie with your identity document and/or your driving license, copy of your residence permit and/or visa, copy of your student card, your license history, your proof of residence, copy of your credit card but only the full cardholder name and the first 6 and last 2 numbers of the credit card, the rest of the informations should be blurred*). In case of suspected fraud, via the App, Getaround may ask you to take a selfie in front of the rented Vehicle equipped with a Connect Device before starting the check-in process.

If you request the removal of your Vetting Data you can no longer rent a Vehicle on our Platform.

1.4.c. For the smooth running of your Rental

We may collect Personal Data during your Rental only for Vehicles equipped with a Connect Device and/or a Dashcam and only in the following circumstances.

Vehicles equipped with a Connect Device and/or a Dashcam are identified as such in the Listing, before the Booking is made.

→ Getaround Connect Data

The Getaround Connect technology implies the installation of a telematic device in the Vehicle at the request of the Owner. The Connect Device only collects and transmits to Getaround the Vehicle's data that are necessary for the smooth running of your Rental with the Getaround Connect technology. That information is essentially linked to the Vehicle itself (ignition status, fuel level, mileage...) to enable the application of potential fees and compensation to the Driver and/or compensation for the Owner.

In addition, the Getaround Connect technology enables geolocation of the Vehicle:

- one (1) hour before the start of the Rental and at the end: to inform you where the Vehicle is and find out where it has been returned. This data facilitates the following Rental and verifies that the Vehicle was returned in the requested area (if not, penalties will be applied);
- during the Rental: if an issue appears preventing its operation (*e.g. Connect Device malfunction difficulties opening/closing the Vehicle*). In that case, an automatic alert is sent out by the Connect Device to Getaround with the identification of the malfunction and the location to enable Getaround to propose a workaround solution (including find another Vehicle nearby) and to enable Roadside Assistance to locate the Vehicle.

Such data is kept for 3 months following the end of the Rental.

→ Dashcam Data

Owners may install in their Vehicle or list on the Platform a Vehicle natively equipped with a Dashcam (i.e. a dash camera filming the front of the Vehicle and potentially the inside of the Vehicle). The Owner is responsible for the processing of the Driver Personal Data.

Records are only kept in the event of an incident and may be shared with Getaround and our Insurance by Owners to ensure claims are processed efficiently and to protect Drivers from being

liable for undue third party claims.

Owners undertake to delete these records within 30 days of the end of the Rental concerned and not to disclose any of these records to third parties who are not qualified to receive them (criminal sanctions for non-compliance may apply).

To exercise their rights about Personal Data, Drivers should contact the Owner and/or Getaround.

2. Why do we process your Personal Data and on what legal basis ?

We process your Personal Data for the following purposes and legal basis:

Legal basis	Purposes
Contract	<ul style="list-style-type: none">● Rental management (<i>payment, rental agreement,...</i>);● Penalties and fees management;● Claims management (<i>damage assessment,...</i>);● Outstanding debt management;● Communication between Users;● Send you an email to remind you of the possibility to leave a review about your Rental, the Owner/Driver and Getaround on the Platform and/or trustpilot.com.● Registration on the Platform;● Verification of your identity (article 1.4.b above);● Listing of a Vehicle on the Platform;● Installation/deinstallation of the Connect Device.
Consent	<ul style="list-style-type: none">● Marketing & communication (<i>by email, notification on your smartphone</i>);● Managing the Referral Program● Call monitoring with our customer agent;● Audience analysis cookies as defined in the Cookies Policy;● Performance cookies as defined in the Cookies Policy;● Advertising personalisation and improvement cookies as defined in the Cookies Policy● Managing the exercise of your GDPR rights.
Legitimate interest	<ul style="list-style-type: none">● Notify you of changes in our Terms, Privacy Policy and Cookie Policy;● Exclusion from the Platform in case of fraud, misbehavior or debt: Users who commit fraud or fraud attempt (eg identity theft, card payment theft), who have an aggressive or strongly inappropriate behavior towards a Getaround agent or another User, or who have an excessive debt towards Getaround, are identified in an exclusion list to enable their identification in case of return on the Platform with a new account;● Guarantee the reliability and security of the operations carried out via the Services offered on our Platform;● Identify, delimit and remove malfunctions and errors in the telecommunication systems : to uncover any unlawful use of the telecommunication systems and services;● To use functional cookies as defined in the Cookie Policy;

	Getaround hereby reserves the right to save and use the App Data and the Website Data afterwards if particular indications become apparent to us (e.g. <i>Users using a rented Vehicle(s) and/or our Service for illegal use</i>).
Legal obligations	<ul style="list-style-type: none"> • Respond to official requests from public or judicial authorities empowered to do so (e.g. <i>request of financial administrator</i>); • Comply with the banking and financial regulation (e.g. <i>security measures, identity verification</i>) to avoid abuse and fraud; • Legal prescription.

3. How long is your Personal Data stored?

3.1. We only store in our active base (i.e. base in which your Personal Data are accessible in the immediate working environment for the operational services in charge of this processing) your Personal Data for as long as is necessary to achieve the purpose for which your Personal Data was collected.

Your Personal Data are stored in our active base for the following duration:

- 25 months for the Personal Data collected via our Cookies;
- 2 years following your last action in relation with our Platform (e.g. *logging in our Platform, clicking on a link in an email,...*);

3.2. At the end of these periods, all your Personal Data will be automatically transferred to our archive base (i.e. your Personal Data may only be consulted on an ad hoc basis by specifically authorized Getaround employees in some specific circumstances).

Your Personal Data are stored in our archive base for the following duration: (the following periods include the time the data was stored in the active base as per Article 3.1 above)

- for the time necessary to cover the applicable limitation periods to which we are exposed in the course of our activity :
 - until 13 months have passed since the last card payment;
 - until 5 years have passed since the creation of your debt or since your last payment date;
 - until 6 years have passed since your last Rental. If the Owner sends to Getaround a video taken by the Dashcam following a damage, the video is kept for the same duration;
- for security reasons to protect our Users' and Getaround's interests until 6 years have passed after the date your Account was restricted.

If your Account falls in multiple categories, we will select the latest date.

Once these periods have elapsed, your Personal Data is anonymized.

3.3. At any time when your Personal Data is in the active base or archive base, if you withdraw the consent you have given us to process your Personal Data or if you request the deletion of your Personal Data, your Personal Data will be deleted but if you fall into any of the cases indicated in article 3.2 above, it will be placed in our archive base and deleted only at the end of the periods mentioned in said article.

4. What data security measures does Getaround implement ?

The access to your Account is only possible after entering your personal password directly or through autologin processes or through Facebook or Google Connect. Before storage, the passwords are hashed using industry standard practices and algorithms. You should always treat your access information confidentially and close the browser window once you have ended your communication with us, particularly if you share the use of the computer and/or device with others.

We employ efficient technical and organizational measures in order to safeguard the Service and other systems against loss, destruction, access, changes or the distribution of your Personal Data by unauthorized persons. The data transfer between the Platform and the server is [SSL] encrypted.

The Driver Payment Data and Owner Payment Data will be processed and stored by our payment providers (Stripe, Paypal and GoCardLess) according to the highest safety measures applicable in the e-commerce sector. Notably, the transaction will be made through a secured and encrypted process and part of the credit card number used will be hidden during its display on screen. We do not store the full credit card details, only the first and last numbers of the credit card are held by Getaround.

Getaround has also set up restrictions in its Connect Device to protect the data privacy of the Driver when renting the Vehicle. The Owner undertakes not to use the Dashcam to try to access, store or view the Personal Data of a Driver for other means than those described in the Privacy Policy.

5. Does Getaround transfer your Personal Data?

Contractual service providers for the smooth running of the Platform	<p>Our contractual service providers are responsible for:</p> <ul style="list-style-type: none">- Letting our Platform be run and hosted on remote servers;- Enabling the provision of the Service via third-party software tools (e.g. through integration with our APIs). <p>These service providers only have access to the Personal Data to run such technical services.</p>
Contractual service providers for the smooth running of your Rental (customer support,...)	<p>Our contractual service providers are responsible for:</p> <ul style="list-style-type: none">- Verifying the Users' identity;- Carrying out technical checks to validate the Vehicles' condition;- Processing claims or disputes related to Rentals;- Providing payment services. <p>They only have access to your Personal Data that are necessary for the execution of their services which include :</p> <ul style="list-style-type: none">- Account Data;- Driver and Owner Payment Data;

	<ul style="list-style-type: none"> - Vetting Data; - App Data; - Vehicle Data; - Getaround Connect Data; - Website Data; - Messages exchanged via our Platform.
Business partners	<p>We may use information about you in partnership with outside companies in the course of providing you with additional services related to Getaround, such as ride-sharing or parking benefits. When you purchase, register, or otherwise express interest in a product or service offered by a third party through Getaround or sponsored on our site, you consent to our sharing of your personal information with those parties. When you choose to participate in rewards programs, contests, discount offers, or other programs that involve third parties, you authorize Getaround to share your personal information with those parties, who may use such information in accordance with their own privacy policies. In these cases we will only share the information reasonably needed to provide you with service. Information that is shared with third parties is subject to the privacy policies of those parties, which may differ from Getaround's privacy policies.</p>
State DMVs	<p>We check Drivers' driver records to make sure Drivers meet Getaround eligibility standards. By registering with Getaround, you authorize us to access your driver's record from state DMVs, RMVs, and other applicable entities, and this authorization extends to Getaround throughout the entire time you use our Service, so that Getaround may re-check your records from time to time. You also authorize said entities to release this information to Getaround.</p>
Insurance	<p>If an incident (<i>eg. damage, breakdown,...</i>) occurs during the Rental, the following Personal Data may be shared with them :</p> <ul style="list-style-type: none"> - Driver Data including Driver Payment Data; - Owner Data including Owner Payment Data; - Vehicle Data; - Documents relating to the damage such as photos, quotes, reports. <p>We may use such Personal Data to investigate damage claims connected to Rentals taken and/or Vehicles listed on our Getaround, and we may disclose personally identifiable information to a third party in connection with processing such claims under reasonable confidentiality restrictions.</p> <p>In case of an accident with a third party, our Insurance may send some of your Personal Data listed above to the third party's insurance.</p>
Uber	<p>If you are a part of the "Drive with Uber" program, Getaround will transfer to Uber the Vehicle Data as detailed in Article 1.3.</p>

	<p>This data is required by Uber to verify that the Vehicle meets Uber's requirements.</p>
Legal authorities	<p>In accordance with prevailing legal provisions, Getaround may be required to provide information to criminal prosecution authorities and courts for prosecution purposes.</p> <p>In such situations, Getaround will send the Personal Data requested without notifying you.</p> <p>We may share license plate information with governmental agencies to ensure compliance with local parking rules and restrictions, to respond or settle a citation issued during a trip, or in accordance with a parking program or partnership operated with a governmental agency.</p> <p>We may also disclose personal information if we believe it to be reasonably necessary to (i) satisfy any applicable law or regulation and comply with legal process, such as search warrant, subpoena or court order, or other government request served on us or on our affiliates; (ii) to enforce our Terms, including to investigate potential violations thereof; (iii) take precautions against liability, to investigate and defend ourselves against any third-party claims or allegations, or to protect the security or integrity of our site; and (iv) to exercise or protect the rights, property, or personal safety of Getaround, our Users, or others.</p>
Credit agencies and other consumer reporting vendors	<p>We may use and share your personally identifiable information with consumer reporting vendors such as credit agencies in connection with a trip that has been booked on our platform. You authorize Getaround to share your personally identifiable information with such vendors to assist Getaround in determining your eligibility to book trips on our platform. Getaround may share your personally identifiable information to obtain your consumer history in the form of a credit score, a background check, and/or an auto insurance score, in all instances solely in accordance with applicable law. You acknowledge that Getaround may (but is not obligated to) use such consumer history in connection with your Getaround account except where such usage is prohibited by applicable law.</p>
Company subsidiaries and transactions	<p>We may share your information in connection with any company transaction, such as a merger, sale of all or a portion of company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by another company or third party. or in the event of bankruptcy or related or similar proceedings.</p>

	Other brands owned or controlled by Getaround, and other companies owned by or under common ownership as Getaround, which also includes our subsidiaries (i.e., any organization we own or control) or our ultimate holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns. These companies will use your personal information in the same way as we can under this Privacy Policy.
User Content	We may share your personal information with others with whom you communicate on the Service and any information that you post or share publicly on our website or service. Any personal information or content that you voluntarily disclose for posting to the Service, such as User Content, becomes available to the public, as controlled by any applicable privacy settings. If you remove information that you posted to the Service, copies may remain viewable in cached and archived pages of the Service, or if other Users have copied or saved that information.

6. Privacy Rights for Members who are California Residents

Effective January 1, 2020, the California Consumer Privacy Act (“CCPA”) allows Users who are residents of California to submit a request to Getaround (a “CCPA Request”) for access to the pieces and categories of personal information, if any, that Getaround has collected about them. Information that Getaround provides in response to CCPA Requests shall, to the extent feasible, be in a readily usable format. Getaround shall specify the purposes for collecting the information, and the types of third parties with whom the information has been shared.

Users who are California residents may also submit a CCPA Request to Getaround for the deletion of their information. However, Getaround may be required to retain certain information in order to comply with other 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 investigations, enforce its Terms and associated policies, and take other actions reasonably necessary, permitted, or required by applicable law.

Users who are residents of California may submit a CCPA Request to Getaround by logging into their Getaround account and [submitting a ticket](#), or by leaving a voicemail at 844-446-2210 that includes the submitting Member’s full name, the email address associated with the User’s Getaround account, and the type of request being submitted. In response to a CCPA Request, Getaround will verify that the request has been submitted by a User associated with the account to which the request relates. In connection with this verification process, Users may be asked to provide government-issued identification to Getaround.

Users who are residents of California may designate an authorized agent to submit a CCPA Request on their behalf. To do so, the authorizing User must submit to Getaround the User's government-issued identification, the authorized agent's government-issued identification, and a valid power of attorney signed by the authorizing User.

Users who submit CCPA Requests will not be charged different prices or provided different levels of service as a result of submitting such requests.

7. How does Getaround communicate with you?

7.1. Notification Procedures and Communications

Getaround may provide notifications, whether such notifications are required by law or are for marketing or other business related purposes, to you via email notice, written or hard copy notice, or through conspicuous posting of such notice on our website, as determined by Getaround in our sole discretion. Getaround reserves the right to determine the form and means of providing notifications to our Users, provided that you may opt out of certain means of notification as described in this Agreement. Getaround is not responsible for any automatic filtering you or your network provider may apply to email notifications we send to the email address you provide us. We recommend that you add info@getaround.com to your email address book to help ensure you receive email notifications from us.

We will not sell your contact information to third parties for marketing purposes.

We may communicate with you via in-app notifications, email, SMS text, or other methods. By signing up for an account on Getaround and providing your cell phone number, you consent to our using of the phone number to send you Service-related SMS messages. You control when and how (e.g. email, SMS, etc.) you would like to receive messages, and you may be able to opt-out of receiving certain types of messages (except for Service-related emails or SMS messages) as described below:

Reply HELP for help

Reply START to resubscribe

Reply STOP to unsubscribe

Message and data rates may apply. Message frequency may vary..

We may send you notifications of activity on the Service to the email address you give us, in accordance with any applicable privacy settings. For instance, if you are a Host, we will send you information about your Vehicle's availability status. You can turn these notifications off or modify how often and in what form you receive them.

Getaround may send you other messages in the course of operation of our Service, such as notifications from other Users, updates about Service changes and new features, and important news that may impact your use and enjoyment of Getaround. These communications may contain

banners, ads, or promotional material provided by third parties. If you click on the third party link, you will be taken to that service, and your information will thereafter be subject to that party's privacy policy. You may be able to opt-out of receiving promotional emails by clicking the "unsubscribe" button at the footer of promotional email communications. Note that you are not permitted to unsubscribe or opt-out of non-promotional messages regarding your account.

By providing Getaround your email address, you consent to our sending you Service-related notices, including any notices required by law, in lieu of communication by postal mail.

7.2. SMS Host Alerts

When you opt-in to the Service, we will send you an SMS message to confirm your signup.

You can cancel the SMS service at any time. Just text "STOP" to 438276. After you send the SMS message "STOP" to us, we will send you an SMS message to confirm that you have been unsubscribed. After this, you will no longer receive SMS messages from us. If you want to join again, just sign up as you did the first time and we will start sending SMS messages to you again.

If at any time you forget what keywords are supported, just text "HELP" to 438276. After you send the SMS message "HELP" to us, we will respond with instructions on how to use our Service as well as how to unsubscribe.

As always, message and data rates may apply for any messages sent to you from us and to us from you. While every Booking may be different, we estimate that you will receive 3-4 messages per Booking. If you have any questions about your text plan or data plan, it is best to contact your wireless provider. For all questions about the services provided by this short code, contact us by submitting a support ticket.

7.3. Telephone Consumer Protection Act (TCPA) Consent

Notwithstanding any current or prior election to opt in or opt out of receiving calls or SMS messages (including text messages) from us, our agents, representatives, affiliates, or anyone calling on our behalf, you expressly consent to be contacted by us, our agents, representatives, affiliates, or anyone calling on our behalf for any and all purposes arising out of or relating to your Service, at any telephone number, or physical or electronic address you provide or at which you may be reached. You agree that we may contact you in any way, including SMS messages or text messages, calls using pre-recorded messages or artificial voice, and calls and messages delivered using auto telephone dialing system or an automatic texting system. Automated messages may be played when the telephone is answered, whether by you or someone else. In the event that an agent or representative calls, he or she may also leave a message on your answering machine, voice mail, or send one via text.

You consent to receive SMS messages (including text messages), calls and messages (including prerecorded and artificial voice and autodialed) from us, our agents, representatives, affiliates or anyone calling on our behalf at the specific number(s) you have provided to us, or numbers we can

reasonably associate with your account (through skip trace, caller ID capture or other means), with information or questions about your use of the Service. You certify, warrant and represent that the telephone numbers that you have provided to us are your contact numbers. You represent that you are permitted to receive calls at each of the telephone numbers you have provided to us. You agree to promptly alert us whenever you stop using a particular telephone number.

Your cellular or mobile telephone provider will charge you according to the type of plan you carry. You also agree that we may contact you by email, using any email address you have provided to us or that you provide to us in the future.

We may listen to and/or record phone calls between you and our representatives without notice to you as permitted by applicable law. For example, we listen to and record calls for training and quality monitoring purposes.