

PRIVACY POLICY

This document, the Privacy Policy (hereinafter the "Policy"), constitutes the rules on the use by Individual entrepreneur Ruslan Nailevich Gayfullin (hereinafter the "Rightholder") of the User's personal information.

1. General Terms and Conditions

1.1 This Policy is an integral part of the User Agreement (hereinafter the "Agreement") posted and/or available on the Internet at: <https://www.thelocalcarrentals.com/license-agreement>, as well as any other Contracts (transactions) concluded with the User or between Users, when expressly envisaged in their conditions.

1.2 By entering into the Agreement, you provide written consent to the following Personal Information processing methods without restraint, of your own free will, and in your own interests: recording, classification, storage, specification (updating, modification), retrieval, use, communication (dissemination, delivery, making available) to third parties, in particular, cross-border transfer to foreign countries, data sanitization, blocking, deletion, destruction for the purposes prescribed in this Policy, with or without use of automation tools, at the Rightholder's discretion.

1.3 This Policy, including interpretation of its provisions and its adoption, implementation, modification and termination procedure, shall be governed by the legislation of the Russian Federation.

1.4 The terms and definitions envisaged in the Agreement and any other Contracts concluded with the User shall be used here and hereinafter, unless this Policy otherwise prescribes or unless otherwise follows from its essence. In other cases, the term used in the Policy shall be interpreted according to the legislation of the Russian Federation, good business practices or scientific doctrine.

2. Personal Information

2.1 Personal information in this Policy means:

2.1.1 The information the User discloses about himself/herself, at his/her own discretion, during registration or authorization and any further use of the Service, including the User's personal data;

2.1.2 The data communicated automatically, depending on the User's software settings, in depersonalized form.

2.2 The Rightholder shall be at liberty to lay down the requirements to the composition of the User's Personal Information required to be provided for the Service use. If the Rightholder does not designate certain information as binding, the User shall communicate or disclose the same at his/her own discretion.

2.3 The User shall specify his/her name, email address and telephone number during registration.

The User shall further indicate the date of birth and the driver's license issue date for the Request creation and Booking.

If an individual acts for a company the User shall specify: the corporate name, address, website, establishment year, short description, link to a social media page, corporate phone number.

The above corporate details are not personal data.

2.4 The Rightholder shall neither validate the communicated Personal Information nor verify whether or not the User has obtained the necessary consent to process the same according to this Policy, assuming that the User acts in good faith, prudently and makes every effort to update such information and to obtain all necessary consents from the personal data owners.

2.5 The User is aware and accepts that third parties' software can be used in the Rightholder's Application, which enables such persons to receive and transmit the data specified in Clause 2.1.2 in depersonalized form.

The specified third parties' software shall include the traffic statistics collection systems Google Analytics, Yandex.Metrics, HotJarr, Tableau, Google Tag Manager.

The composition and conditions of depersonalized data collection via third parties' software shall be determined by their rightholders and may comprise:

- browser data (type, version, cookie);
- device data and location;
- operating system data (type, version, screen resolution);
- request data (time, transition source, IP address).

2.6 The Rightholder shall not be liable for the procedure, in which the third parties the User communicates with as part of applying the User's Personal Information utilize the Service.

3. Personal Information Processing Goals

3.1 The Rightholder shall process, in particular, collect and store the necessary Personal Information for conclusion and performance of Contracts with Users only.

3.2 The Rightholder and/or Users shall be entitled to utilize the Personal Information for the following goals:

3.2.1 Entering into Contracts via the Service.

Entering into Contracts, issue of Requests and Bookings shall be implemented remotely, by exchanging e-documents to be signed with a basic electronic signature. The login/ password pair or the User's email address may serve as the User's basic electronic signature key. The telephone number can be inserted as a login. The telephone number may be used for the authentication code forwarding. Therefore they are required during registration;

3.2.2 Identifying the User as part of discharging the obligations under the Contracts concluded with the User.

The login/password, the User's email address and telephone number are attached to the User's personal account;

3.2.3 Discharging the obligations under concluded Contracts, in particular, granting access to the Service and technical support to the User, the User's utilization of the Service's features.

Requests, Bookings and help desk calls shall be accepted via the User's Personal Account.

The Request- and Booking-related notifications to the User shall be sent by telephone and email, including accounts in any messenger services (messengers and social media) registered in them.

The driver's date of birth and driver's license issue date are requested because the car rental opportunity and conditions, including the price, depend on the driver's age and driving experience;

3.2.4 Security and Privacy of the User's Personal Information.

Details of IP address and browser the User uses to enter the Website through shall be collected to check for suspicious activity on the Website;

3.2.5 Notification as part of promotional services and improving the Service quality under concluded Contracts, in particular, with third parties' involvement.

The User's email address and phone number are requested at registration for this purpose;

3.2.6 Marketing, statistics and other research with depersonalized data to enhance the provided Service as well as the targeting of advertising matter and/or news items.

Depersonalized data is collected and examined to learn how much time the Users spend in different Website pages, their interests and preferences.

4. Personal Information Protection Requirements

4.1 The Rightholder shall keep the Personal Information and protect it from unauthorized access and dissemination according to the internal rules and regulations.

4.2 The User's Personal Information shall not be disclosed unless the provided Service technology or the settings of the software the User utilizes envisage public information sharing with other participants and web users.

4.3 The Rightholder shall be free to keep the log files on the User's actions within the Service utilization and in connection with the User's conclusion and implementation of the Agreement and other Contracts on its part, for 1 (One) year.

4.4 Users who gained access to other Users' or third parties' personal data when utilizing the Service shall comply with Clauses 4.1 and 4.2 of this Policy and process the obtained personal data according to this Policy and applicable law.

5. Information Transfer

5.1 The Rightholder shall be entitled to communicate Personal Information to third parties in the following cases:

- The User consented to such actions, in particular, when the User applies the software settings not restricting disclosure of certain information;
- The User's utilization of the Service features necessitates such transfer;

- The transfer is required to conclude and fulfill Contracts via the Service, in particular, to Lessors (“Partners”) to submit proposals to Requests and to process Booking;
- In connection with the Rightholder's Application transfer to such third party in possession, use or ownership or with assignment of rights under contracts concluded with the User to a third party;
- At the request of a court or another competent government agency within the statutory procedure;
- To protect the Rightholder's rights and legitimate interests in connection with breaching the Contracts concluded with the User.

6. Personal Information Modification

6.1 The User shall be at any time entitled to edit the Personal Information the User provided at registration or authorization in his/her Personal Account.

6.2 If the concluded Contract terminates, the User shall be free to delete his/her Personal Account, by approaching the Rightholder's Support department at info@thelocalcarrentals.com.

7. Confidentiality Policy Modification

7.1 The Rightholder shall be entitled to modify or terminate this Policy unilaterally, without prior notice to the User. The new version of the Policy shall take effect upon its posting in the Rightholder's Application, unless otherwise envisaged in the new version of the Policy.

7.2 The current version of the Policy is available on the Rightholder's Website at: <https://www.thelocalcarrentals.com/privacy-policy>.

Rightholder:

Individual entrepreneur Ruslan Nailevich Gayfullin

Primary State Registration Number of the Individual Entrepreneur: 317502900055164

TIN: 504792970355

E-mail: info@thelocalcarrentals.com

The current version of the Policy dated January 1, 2018.