

3. PRIVACY NOTICE FOR RASA BETA TESTERS.

Riversimple, in accordance with the United Kingdom General Data Protection Regulation (UK-GDPR) is committed to ensuring the lawful, fair and transparent processing of all personal data under its control.

In order to engage you as a Beta Tester, it is necessary for us to obtain and process personal data in accordance with the provisions in this privacy notice.

3.1 Who controls and processes your information?

Data Controller: Riversimple Movement Ltd and applicable group companies (Riversimple).

Data Processor: Riversimple, Salesforce, Quartix, Google, Wordpress, Formidable Forms, Mailchimp, Voip Shop, PandaDoc, Zoom, Amazon Web Services (AWS), PayPal (as applicable), and Xero (as applicable).

3.2 The information we collect:

We collect and process a range of information about you, including:

- Full name;
- Date of birth;
- Country of birth;
- Residential address;
- Proof of address, to include a copy of a recent utility bill;
- Email address;
- Telephone numbers;
- Employment status and Occupation;
- Organisation name (as applicable);

- Copy of driving licence and passport;
- Driving history, to include accident and motoring offence history and any pending prosecutions;
- Driving characteristics, to include how you drive and the speed you drive;
- Journey details, to include locations, dates and times;
- Details of your vehicle(s) including make/model/age and registration plate;
- Details of any medical conditions that affect your ability to drive;
- Insurance history, to include any declined or cancelled policies or special conditions;
- Motor vehicle accident history, to include any details of accidents in the last 5 years;
- Details of the use of your vehicle to include installing a GPS tracker onto your vehicle;
- Details of how much you spend on driving (e.g. insurance, tax, maintenance, MOT, fuel);
- Details of any accidents or motoring offences arising during usage of the vehicle;
- Details of your credit history, to include a recent credit check (as applicable);
- Details of any next of kin; and
- Images and footage of your use of the vehicle, Riversimple events, and training both online and offline at events.

3.3 How we collect your information:

We collect information through a number of means, including:

- Email;
- Phone;

- Contact form on our website;
- Online surveys on our website;
- User Declaration Form;
- Post;
- In-person;
- Video calls;
- Video and audio recordings; and
- Through the telemetry devices.
- Driving licence check with DVLA

We will also collect information about you from third party credit reference agencies.

3.4 Why we process your information (the Purpose):

(A) To **communicate with you** about:

- Coordinating your Beta Test;
- Collection, servicing and return of the Rasa Beta;
- Arranging suitable insurance cover for the use of the Rasa Beta;
- Notification of any need to recall the Rasa Beta - e.g. if we discover a potential safety issue;
- Analysis of the Rasa Beta behaviour while you are using it (subjective and technical feedback);
- Analysis of the Riversimple Service offering (subjective and technical feedback);
- Any parking charges or fixed penalty notices which may arise during your use of the Rasa Beta;
- Events and activities;
- General Riversimple updates and information; and
- Transfer of any payment or deposit taken (if applicable).

(B) To meet our **regulatory requirements** in relation to:

- Road Traffic Act 1988;
- Criminal Finances Act 2017; and

- Money Laundering Regulation 2017.

(C) To **support our technological and business development** through vital analysis of the information coming out of the Beta Test, including:

- Your feedback, opinions and thoughts on the Rasa Beta and Riversimple Service;
- Your driving behaviour; and
- Information from the telemetry devices.

(D) To **support any necessary investigations** into the cause(s) of accidents & incidents arising during your use of the vehicle.

(E) For **communication and marketing** purposes.

3.5 The Lawful Basis for which we process your information:

For 3.4 (A), the lawful basis is:

The performance of a contract (Article 6(1)(b) of the UK-GDPR).

As a Beta Tester we have a contract with you and we need to process your information to comply with obligations under that contract.

We also have a lawful basis under the **vital interests of the data subject** or another natural person (Article 6(1)(d) of the UK-GDPR)

In the event of a potential safety issue coming to light we need to be able to inform you

For 3.4 (B), the lawful basis is:

Compliance with a legal obligation (Article 6(1)(c) of the UK- GDPR).

Riversimple is obliged to process your information in order to comply with the law to which we are subject.

For 3.4 (C), the lawful basis is:
Processing is necessary for the **legitimate interests** pursued by the Data Controller (Article 6(1)(f) of the UK-GDPR).

The purpose of the Beta Test is to collect data on vehicle(s) behaviour and characteristics, including both technical and subjective feedback in order to further develop our vehicle and business model.

For 3.4 (D), the lawful basis is:
Processing is necessary for the **legitimate interests** pursued by the Data Controller (Article 6(1)(f) of the UK-GDPR).

In the event of an accident or incident Riversimple needs to be able to systematically analyse all potential cause(s) and contributing factors and accurately determine those which gave rise to the incident.

Riversimple complies with the three-part test for reliance on the legitimate interest basis. Namely, that it is legitimate, necessary and balanced against your individual interests, rights and freedoms.

For 3.4 (E) the lawful basis is:
Processing is necessary for the **legitimate interests** pursued by the Data Controller (Article 6(1)(f) of the UK-GDPR).

Riversimple has a legitimate interest to communicate regarding the experience that testers are having with its products and services.

Riversimple complies with the three-part test for reliance on the legitimate interest

basis. Namely, that it is legitimate, necessary and balanced against your individual interests, rights and freedoms.

3.6 Who has access to your information:

Your information will be shared internally where appropriate, and in line with 3.8.

We use a number of trusted third parties to provide us with necessary services to run our business, and who may process your information on our behalf:

- Google - Email, data storage, and online survey provider;
- Mailchimp - Mailing list processing service provider;
- We are the Missing Link - Web developer & hosting provider;
- H.W Wood Limited - Insurance broker;
- Travellers Insurance Company Limited - Insurance provider;
- Wordpress & Formidable Forms - host for sign up form;
- Salesforce - customer relation manager (manages contact details);
- Quartix - GPS tracker provider;
- Zoom - video conferencing;
- Voip Shop - telephone provider;
- Pandadoc- e-signature provide;
- AWS S3 - Telemetry data storage service;
- PayPal - online payment system provider as applicable;
- Xero - accounting software as applicable; and
- WhatsApp- communication channel (mobile phone number and name if supplied only)

3.7 How your information is used:

Your information is only used for the Purpose(s) defined in 3.4, in accordance with the lawful basis detailed in 3.5.

3.8 How we secure your information:

We take appropriate technical and operational measures to ensure that your information is managed carefully and appropriately and to protect against unlawful or unauthorised use and accidental loss or destruction, including:

- Only providing access to those who need access to carry out the Purpose;
- Passwords are protected and, wherever possible, two-factor authentication is employed for extra protection;
- Our file storage provider uses encrypted sessions to protect files as they are uploaded and downloaded; and
- Hard-copy information is stored securely in locked cabinets with access limited to only those who need to have access to carry out the Purpose.
- Hypertext Transfer Protocol Secure (HTTPS) is used to transfer data to and from our Amazon Web Services (AWS) System. HTTPS is a secure communication protocol that is encrypted using Transport Layer Security (TLS).

3.9 Data Transfers:

(A) Transfers within the UK and the European Economic Area:

Insurance Providers - we use a UK based insurance broker to source our insurance for us. Sometimes this may require the

transfer of personal data within the European Economic Area. At all times, this is managed in line with strict rules that meet with GDPR. Individuals may request information about specific safeguards applied to the export of their data.

Law enforcement bodies - we will notify you in the event we are required to pass your details on to a law enforcement body.

Private parking companies - for a valid violation of their terms and conditions and the Driver Vehicle Licensing Agency (DVLA) - for Keeper at Date of Event (KADOE).

The BPA, DVLA and ICO for auditing purposes and potential complaint investigation and resolution.

Credit reference agents for the purpose of due diligence and writing to you at your most recent correspondence address

Payment Processor for processing any online payments

If you have not replied to our correspondence, solicitors for the purpose of enforcing contractual obligations or responding to a legal query. Debt recovery companies for the collection of outstanding charges.

Emergency services - in the event of an emergency or for the purposes of preventing and detecting crime, we may be required to provide Ambulance, Fire or Police with your personal information, to include your emergency contact details.

European Union - FCH JU - Collation of anonymised user feedback data collected via questionnaire.

(B) Transferring of your information outside the European Economic Area:

Information you submit to us is stored on our third party cloud-based data storage and email provider's servers.

Country: United States of America
Safeguard(s) used: our email and cloud-base providers are approved on the basis of data processing agreements incorporating the standard contractual clauses as required by the UK-GDPR and Data Protection Act 2018.

Insurance Providers - sometimes this may require the transfer of personal data outside of the UK or European Economic Area. At all times, this is managed in line with strict rules that meet with UK-GDPR. Individuals may request information about specific safeguards applied to the export of their data.

Mailchimp - USA
Zoom - USA
AWS - USA

Where this data is transferred outside of the EEA it shall be processed only by entities which: (i) are located in a third country or territory recognised by the EU Commission to have an adequate level of protection; or (ii) have entered into Standard Contractual Clauses with the Processor; or (iii) have other legally recognised appropriate safeguards in place, such as data processing agreements incorporating the standard contractual clauses as required by the UK_GDPR and Data Protection Act 2018.

3.10 How long we will hold onto your information:

For 3.4 (A) we will retain your information for the duration of the Beta Test and a

period of five years thereafter. After this date your personal information will be deleted or fully anonymised (for further analysis at our discretion), unless:

- An insurance claim has been made during the Beta Test period - in which case we will hold on to your personal information for six years after the claim date; and/ or
- Where a special circumstance has arisen during the Beta Test period, to include the involvement of law enforcement bodies or legal proceedings - in such a case we will hold on to your personal information for a further six years after the special circumstance date.

For 3.4(B), in line with our legal requirements, we hold on to any personal information relating to a particular transaction for five years after the date the transaction is completed. Supporting records are kept for five years after your Beta Test.

For 3.4(C) we hold on to any personal information for only as long as is necessary for the legitimate interest and no longer.

You may leave the WhatsApp communication group at any time.

3.11 Your rights in relation to your information:

(A) You have the right to **object to the processing** of your information, or to **request that we restrict** how your information is processed. We are obliged to comply with such requests unless there is a legitimate basis for not doing so.

Please contact gdpr@riversimple.com to

register any objections to or request any restrictions of processing.

(B) Access requests - you may request that we supply all the information we hold about you, at any time. We will endeavour to respond with such information within 30 days. There is no charge for this, except where such requests are clearly unreasonable, in which case a fee of £10 may be charged. We may require proof of ID to ensure such information is not disclosed to persons other than those to which the information pertains. Please contact gdpr@riversimple.com if you wish to make an access request.

(C) If you feel your information has not been processed in a lawful, fair or transparent manner you have the right to lodge a complaint with the Information Commissioner's Office. Their website can be accessed at www.ico.org.uk and concerns may be reported at <https://ico.org.uk/concerns/>.

3.12 What happens if your information is compromised?

In the event we discover a breach in the way we handled your personal information, we will notify the Information Commissioner's Office within 72 hours of our becoming aware of it. Where we consider there to be any risk to you as a consequence of the breach we will notify you immediately with details of any resulting risks and measures we have taken or intend to take, and any recommended actions that may help you.

3.13 Sensitive Personal Information:

We will collect and process sensitive personal information relating to:

- Your health - details of any medical conditions that affect your ability to drive. We rely on your explicit consent under Article 9(2)(a) of the UK-GPDR, to the processing of this sensitive information in order to obtain suitable insurance cover as well as safeguard you and the general public when using the Rasa Beta. This information may be used by Riversimple or our insurers for automated and non-automated decision making for the purposes of assessing suitability and eligibility to drive our vehicles; and
- Your Motoring History - this may include details of any actual or alleged motoring offences conducted prior to or during your use of the Riversimple vehicle. This information will be processed in line with Article 10 of the UK-GDPR. This information may be used by our insurers for automated and non-automated decision making for the purposes of assessing suitability and eligibility to drive our vehicles.