

Last updated: October 2021

Privacy Policy

WE HAVE CREATED THIS PRIVACY POLICY BECAUSE WE HIGHLY VALUE YOUR PERSONAL DATA AND INFORMATION.

PLEASE READ IT AS IT INCLUDES IMPORTANT INFORMATION IN RESPECT OF YOUR PERSONAL DATA AND INFORMATION.

1. Privacy statement

WheelShare LTD (IL), (hereinafter: **“WheelShare” and/or “We”**) is developing advanced technologies in order to provide accessible, simple, and efficient services to public venues in Israel and around the world. WheelShare’s mission is to revolutionize the accessibility standard at every public venue, including hospitals, airports, shopping centers and more.

WheelShare provides and operates digital docking solution for lending and / or renting wheelchairs or any other product (hereinafter: **“The Station”**), for people with temporary limited mobility or any other person which decides to use the Services, (all together hereinafter: **“The Services”**).

Furthermore, WheelShare develops and operates the WheelShare’s Official Website: www.WheelShare.com (hereinafter: **“The Website”**). WheelShare headquarter is based in Israel.

THIS PRIVACY POLICY REFERS TO: THE SERVICES, THE WEBSITE, WHEELSHARE’S CUSTOMERS OR POTENTIAL CUSTOMERS, END-USERS, DATA SUBJECT, WHEELSHARE’S EMPLOYEES AND SERVICE PROVIDERS ETC.

This Privacy Policy sets forth our policy with respect to information that can be associated with or which relates to a person and/or could be used to identify a person, such as name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person, all as define by the General Data Protection Regulation (GDPR) (EU) 2016/679 (**“Personal Data”**).

“Non-Personal Data” as used in this Privacy Policy is therefore any information that does not relate to a person and/or cannot be used to identify a person. The limitations and requirements in this Privacy Policy on how we gather, use, disclosure, transfer and store/retain Personal Data do not apply to Non-Personal Data as We may use.

2. Data that we use, receive, collect, process share, or store and how we use it.

2.1. Information relates to Customers or Potential Customers, End user, Data subject, Service Providers, Employees or Candidates etc.:

2.1.1. WheelShare uses, receives, collects, processes, or stores only that Information which is necessary to provide its services and operate its business.

2.1.2. We might use, receive, collect, process or store Personal Data on potential customers, customers, employees, service providers, users of the Services and the Website etc.

2.1.3. **This Information may include Personal data such as:**

2.1.3.1. Information related to Customer or Potential Customers and End user: Name, Phone and Cellphone numbers, Email address, Personal address, Location of the provided service, representative personal contact details, financial information (i.e. billing information, bank account information, credit card information), health information (i.e. Wheelchair relevance), End Users' Website or Services engagement and usage data, IP address, Audio, visual and similar information, such as images and audio, video or call recordings created in connection with our business activities, Social network contact accounts , etc.

2.1.3.2. In addition to the above, more information related to employees and / or candidates: Demographic data (i.e. gender, date of birth etc.), CVs, ID number/Passport number, Education and employment history etc.

2.1.3.3. More Information regarding Suppliers: Business email addresses, VAT Number, Signature, etc.

2.1.3.4. **We use cookies and similar tracking technologies** to track the activity on our Website and hold certain information. Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Website. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Website. Examples of cookies we use:

- Session cookies – for operating our Website.
- Preference cookies – for remembering your preferences and various settings.
- Security cookies – for security purposes.

2.1.3.5. This Personal Data provided to us voluntarily and/or or through the data owner's consent to collect and process it, and/or the processing thereof is necessary to meet contractual obligations entered into by the data owner and WheelShare, and/or the Processing thereof is necessary for WheelShare to comply with its legal obligations, and/or Processing thereof is for the purposes of legitimate interests pursued by WheelShare.

2.1.4. **We use this Personal Data in a manner that is consistent with this Privacy Policy and applicable laws and regulations. We may use the Personal Data as follows:**

- 2.1.4.1. **Processing and Analyzing:** In order to provide WheelShare's Services and operates its business, WheelShare may use the Personal data for processing and analyzing purposes.
- 2.1.4.2. **Specific purpose:** If you provide Personal Data for a Specific purpose, WheelShare may use said Personal Data in connection with the purpose for which it was provided. For instance, if you contact WheelShare by your personal phone number, we will use the Personal Data you provide to answer your question or resolve your problem and will respond to your phone number used to contact us.
- 2.1.4.3. **Internal-Business:** We may use your Personal Data for internal business purposes, including, without limitation, to help us improve our Services, Station and Website content and functionality, to better understand our Customers and Users, to protect against, identify or address wrongdoing, to enforce our Contracts and this Privacy Policy, to provide you with customer service, and to generally manage and operate our business (e.g., pay salaries and make considerations).
- 2.1.4.4. **Marketing:** We may use any Personal Data you provide us with to contact you in the future for our marketing and advertising purposes, including, without limitation, to inform you about new services we believe might be of interest to you, and to develop promotional or marketing materials and provide those materials to you.
- We may share your Personal Data with our Partner or relevant third parties, whether with or without payment, which they may contact you to offer complimentary services or other commercial offers subject to your consent. Any Partner or third party engagement with you, including contacting you, is under the Partner's or third party's sole responsibility and own Privacy Policy.

IF YOU RECEIVE DIRECT MARKETING OR YOU WERE CONTACTED BY OUR PARTNERS OR THIRD PARTIES BY MISTAKE OR WITHOUT YOUR SPECIFIC CONSENT AND/OR YOU WISH TO OPT-OUT, OR YOU DO NOT AGREE TO THE TRANSFER OF YOUR PERSONAL DATA TO OUR PARTNERS OR THIRD PARTIES, YOU ARE REQUIRED TO CONTACT US AT meir@wheel-share.com.

- 2.1.4.5. **Statistics:** We may use any Personal Data you provide us with to generate statistical reports containing aggregated information.
- 2.1.4.6. **Security and Dispute Resolution:** We may use Personal data to protect the security of our Station, Website and Services, to detect and prevent cyberattacks, fraud, fishing, identity theft, and data leakage, to verify genuine software licenses, to resolve disputes, and to enforce our agreements.

- 2.1.4.7. **Data Retention, Archives:** We retain and archive Personal data so long as it necessary to operate our business and maintain our Station, Website and Services, meet contractual obligations, laws and regulations, defend from legal claims, subject to our retention policies and this Privacy Policy.
- 2.1.4.8. **Transfer/Share/Disclose Data:** We may share your Personal Data with our Partner, contractors and service providers who process Personal Data on behalf of the Company to perform certain business-related functions. we may provide them with information, including Personal Data, in connection with their performance of such functions. While we do so, we make sure that they are bound to maintain said Personal Data in accordance with this Privacy Policy. When we disclose the Personal Data, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.
- 2.1.4.9. **Cloud Services:** We may need to share personal data among our cloud service. For example, assist in protecting and securing our Station, Website or Services the cloud service admin may need access to personal data to provide those functions. In such cases, the cloud service provider must abide by our data privacy and security requirements and is not allowed to use Personal Data they receive from us for any other purpose.
- 2.1.4.10. **Development and Customer Service:** For example, to provide customer service and support or assist in protecting and securing our systems and services our development and customer service team may require access to Personal Data. In such cases, our personnel must abide by our data privacy and security requirements and policy and are not allowed to use personal data for any other purpose.
- 2.1.4.11. **Corporate Sale, Merger, Reorganization, Dissolution or Similar Event:** Personal Data may be part of the transferred assets. You acknowledge and agree that any successor to or acquirer of WheelShare (or its assets) will continue to have the right to use your Personal Data and other information in accordance with the terms of this Privacy Policy.
- 2.1.4.12. **Law Enforcement:** In order to, for example, respond to a subpoena or request from law enforcement, a court or a government agency (including in response to public authorities to meet national security or law enforcement requirements), or in the good faith belief that such action is necessary to (a) comply with a legal obligation, (b) protect or defend our rights, interests or property or that of third parties, (c) prevent or investigate possible wrongdoing in

connection with the Services, Station and Website (d) act in urgent circumstances to protect the personal safety of Users of the Station, Website and Services or the public, or (e) protect against legal liability.

- 2.1.4.13. **Other Purposes:** If we intend to use any Personal Data in any manner not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time the Personal Data is processed.

IF YOU HAVE A REASONABLE BASIS TO ASSUME OR YOU KNOW THAT ANY OF THE ABOVE MENTIONED IS NOT MET, YOU ARE REQUIRED TO PROMPTLY INFORM US, WITHOUT DELAY, BY SENDING US AN EMAIL TO: meir@wheel-share.com

- 2.2. **Non-Personal Data:** Since Non-Personal Data cannot be used to identify you in person, we may use such data in any way permitted by law.

3. How We Store and Transfer Personal Data.

- 3.1. **In order to provide our Station, Website and Services, manage and operate our business, we use third parties cloud services such as:**
- 3.1.1. The Microsoft office 365
 - 3.1.2. Wheel-Share stores all data which is being collected by its Website and stations on Microsoft AZURE cloud services. For Microsoft Azure Privacy policy and TOU please refer to <https://azure.microsoft.com/en-us/support/legal/>. WheelShare primary database storage location is in Europe (WEST EU).
- 3.2. In order to deliver our services and/or operate our business, Information, which may include Personal Data, may be processed by our third parties service providers (“**Suppliers**”). We transfer only the minimum data that is necessary for conducting our services. The data is transferred only to Suppliers approved by us that allow compliance with GDPR.
- 3.3. Personal data may be transferred, stored, and processed in countries outside the EU or European Economic Area (EEA). Such transfer to third countries may include countries that do not ensure an adequate level of data protection as required by EU privacy laws. We implement high level of information security technics & technical measures and/or third parties' contractual obligations to maintain their Information security level adequate to WheelShare level.
- 3.4. We may transfer Personal data to Israel country where we maintain our headquarter facility. Israel is considered by the EU as having adequate data protection law.

4. Personal Data Security.

- 4.1. We are strongly committed to protecting your Personal Data and information, and we will take reasonable technical organizational and legal steps and measures, accepted in our industry, to keep your Personal Data secured and protect it from loss, misuse or modification.

However, no network, server, database or Internet or e-mail transmission is ever fully secure or error-free. Therefore, you should take special care in deciding what information you disclose.

- 4.2. If you notice any security risks or violations, we advise you to report them to us at meir@wheel-share.com, so that we may resolve them as soon as possible.
- 4.3. We recommend that you use, disclose and share your Personal Data and information with caution and do not give out Personal Data and information unless it is necessary, as we cannot guarantee the security of data over the internet and cannot control actions of other users of the Services and Station with whom you choose to share Personal Data and information.

5. Individual rights: Accessing, Updating, Correcting, Deleting, Restricting Information Processing and Data portability right.

- 5.1. You may have the **right to request access** to some of your Personal Data being stored by us. Once we receive and confirm your request, we will disclose to you, inter alia:
 - 5.1.1. The categories of personal information we collected about you.
 - 5.1.2. Our business or commercial purpose for collecting that personal information.
 - 5.1.3. The categories of third parties with whom we share that personal information.
 - 5.1.4. The specific pieces of personal information we collected about you (also called a data portability request).
- 5.2. You can also ask to **correct and update any inaccurate Personal Data or ask to delete Personal Data** that we process about you. The foregoing is subject to our policies and the applicable laws and regulations. Once we receive and confirm your request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies by the GDPR.
- 5.3. In order to **exercise these rights**, you can contact us at: meir@wheel-share.com. Only you or other person that you authorize to act on your behalf may make a request related to your Personal Data.
- 5.4. **Non-Discrimination.** We will not discriminate against you for exercising any of your GDPR rights. Unless permitted by the GDPR, we will not: Deny your use of our Station, Website and Services and /or Provide you a different level or quality of Services, Station or Website.
- 5.5. We may **retain** your Personal Data for a period permitted or required under applicable laws. Even if we delete your Personal Data it may remain stored on backup or archival media for an additional period of time due to technical issues or for legal, tax or regulatory reasons, or for legitimate and lawful business purposes.
- 5.6. You may have the right to restrict processing if one of the following applies:
 - 5.6.1. The accuracy of the personal data is contested by the data owner;
 - 5.6.2. The processing is unlawful and the data owner objects to having their Personal Data erased, instead requesting that its use be restricted;
 - 5.6.3. Your service provider no longer needs the Personal Data for the purposes of the original processing, but the data is required by the data owner for the establishing, exercising or defending legal claims;
 - 5.6.4. The data owner has objected to processing pending verification whether the legitimate grounds of your service provider override those of the data owner.

5.7. If you wish to **object to processing**, you are required to contact us at meir@wheel-share.com.

6. General.

- 6.1. This Privacy Policy does not apply to any Personal Data that you provide to third parties.
- 6.2. This Privacy Policy applies only to the Station, Services and Website; it does not apply to third-party websites or services linked to by the Station, Website and Services or whose services we distribute or to any of your engagement with our Partner or third party. Links from the Station, Website or the distributed third-parties' services do not imply that we endorse or have reviewed said third-party websites or services. We suggest contacting these third-parties directly regarding their privacy policies.

7. Change in Terms and Conditions.

- 7.1. The Services and our business may change from time to time. As a result, at times it may be necessary for us to make changes to this Privacy Policy. We reserve the right, at our sole discretion, to update or modify this Privacy Policy at any time (collectively, "**Modifications**"). Modifications to this Privacy Policy will be posted on the Station, Website or Services with a revised 'Last Updated' date at the top of this Privacy Policy.
- 7.2. Please review this Privacy Policy periodically, and especially before you provide any Personal Data or information. This Privacy Policy was last updated on the date indicated above. Your continued use of the Services, Station and Website following the implementation of any Modifications to this Privacy Policy constitutes acceptance of those Modifications. If you do not accept any Modification to this Privacy Policy, your sole remedy is to cease accessing, browsing and otherwise using the Website, Station or our Services.

8. Dispute Resolution.

8.1. If you have a complaint about WheelShare's privacy practices, you should write to us at: .

Our Contact details:

Email: meir@wheel-share.com

Phone No.: +972(0)3-774-0916 (IL); +44(0)1747-440-916 (UK)

Official address: 21 HaMelacha st., Rosh Ha'Ayin, Idan 1 Bldg., Israel

8.2. We will take reasonable steps to work with you to attempt to resolve your complaint.

9. General Inquiries and complaints

- 9.1. You may have the right to lodge a complaint with a supervisory authority. However, prior to doing so, you are welcome to contact us by email at meir@wheel-share.com in order to resolve the issue for the benefit of all parties.
- 9.2. Our supervisory authority is the Israeli Data Protection authority.