

PRIVACY STATEMENT PATH TO PARK

We are committed to your privacy.

This policy (together with our terms of use and general terms and conditions) sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by PATH TO PARK. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

The term "Personal Data" refers to information about you personally (name, license plate, phone number, email, etc). Please do note that as a consequence of both changes in the law and the everchanging nature of technology, our data practices is subject to modifications. Every time a change takes place we will update our Privacy Statement to inform you of the changes. We encourage you to check this page regularly.

This statement applies to the collection and use of personal data for the main purpose of the guidance to available parking spots.

1. Collection and use of personal data

1.1 General

You may provide us with information by filling in forms on our website(s), app or by corresponding with us by phone, email, using our platform, or otherwise. This includes information you provide when you register on our websites, send us a request, contact our customer service, utilize our app, enter into a contract for the supply of services, enter a competition, promotion or survey and when you report a problem with our site. The personal information you provide may include your name, address, email address, phone number, license plate and the parking location necessary to enable us to provide you with our services or our answer.

We do not use your personal data for any other purpose than those described here and we will not sell or otherwise share your Personal Data with any other company outside the Yellowbrick International Group, except for, in the case of the processing of booking of an Offstreet parking spot, the Client (parking operator) on behalf of which we operate the booking. The data shared with the Client may of course include licence plate data and will not be sold

1.2 Guidance to available parking spots

More specifically, in order to process your request to be guided towards available parking spots, we collect the following information:

- Geo Location (to be consented)
- License Plate

- Contact Email address
- Contact Phone number
- Country (for preferred language)

The location data are necessary to compute the best route to available parking spots and to offer turn by turn guidance. The license plate data can be used in some locations where booking for Offstreet parking is available

We also analyze usage to find new product solutions for our customers to enhance our services or implement new services such as location based services, for market share research; to further optimize products; to create specific promotions where we reward app usage.

In this intent, we collect Android advertising ID and might transmit it to advertising company in order to integrate ads and promotions in our app

In order to process your payment in locations where booking is available, we will be required to collect the following information:

- Credit card/Debit Card details

Please consider that when using a credit card as payment method, your card data will not be stored in the PATH TO PARK database. The information is entered and stored directly by the party who handles the credit card payments on our behalf and these data are therefore not visible at all to PATH TO PARK employees. Please do consult the Privacy Statement of the party handling the Credit card information.

1.3 Use of IP address

We may use your IP address to help diagnose problems with our server and to administer our web site. An IP address is a numeric code that identifies your computer on a network or the Internet.

1.4 WhatsApp and other Social Media Channels

PATH TO PARK logs the chat conversations of its WhatsApp service and other social media channels exclusively for quality purposes and will not share this with or sell this to third parties. Do not enter privacy sensitive personal data via WhatsApp or other social media channels.

1.6 Information about you and your device

Each time you use our Services, we may automatically collect the following information:

- technical information, including the type of device you use, a unique device identifier (for example, the MAC address of the Device's wireless network interface or the mobile phone number used by the Device), mobile network information, your mobile operating system, time zone setting, your IP address, browser type, domain names, access times and referring website addresses (the "**Device Information**");

- information stored on your Device, including, login information, and previous location history (the “**Content Information**”);
- details of your use of the App or any of our Services or your visits to our website and to the resources that you access including, but not limited to, traffic data, request made for parking availability and booking a spot

2. DISCLOSURE of your information

We may disclose some or all of the data we collect from you when you download the App or use the Site and/or the Services to the following third parties:

- other members of our group of companies;
- third parties only to the extent to ensure the usability of our services and within the scope of the contract we have with you.

Your personal data will therefore not be passed to any further third parties without your explicit permission, unless this is necessary to provide the service or complete the contract. PATH TO PARK is legally obliged to cooperate with law enforcement agencies if these request information. Please consider that we will only transmit this information within the scope of our statutory duty of disclosure or if we are obliged to disclose this data by a court judgement.

3. Data integrity and security

We employ our best efforts to maintain full reliability, accuracy, completeness and currency of all Personal Data in our databases and to protect the privacy and security of our databases.

Our servers and our databases are protected by industry standard security technology.

We do take data protection within our company very seriously. Our internal staff and contracted service companies have a duty of confidentiality and comply with the current data protection regulations.

Nevertheless, unfortunately, we cannot guarantee against any loss, misuse, unauthorised disclosure, alteration or destruction of data, we do take all reasonable steps to prevent this from happening.

4. YOUR RIGHTS: data access and corrections

As soon as we receive a possible written request from you, we will enquire about your identity to make sure we are not divulging your Personal Data to anybody else and we proceed then to disclose to you the Personal Data we hold about you. We will also correct, amend or delete any Personal Data that turns out to be inaccurate.

Your request will be dealt with promptly, within 30 days.

If you wish to access or correct your Personal Data or if you have any questions about this Privacy Statement or concerns about the way we process your Personal Data, please email our data protection officer at whoosh@parkeon.com, or alternatively write to PATH TO PARK 100 avenue de Suffren, 75015 Paris.

5. YOUR RIGHTS: right of information and withdrawal (right to be forgotten)

You can obtain information free of charge at any time about your data. Please consider also that you can submit us your request to block, rectify or delete personal data that we have saved about you. Moreover, you can revoke the consent you have given us to collect and use your data. To do so, please contact this address whoosh@parkeon.com, or alternatively write to PATH TO PARK 100 avenue de Suffren, 75015 Paris.

We will be glad to answer any further question you may have about our data protection policies and the processing of your personal data.

Your request will be dealt with promptly, within 30 days.

Please do consider that data protection regulations and the way third parties handles data (for instance Google), can continuously change. It is therefore advisable and necessary to keep up to date with changes to statutory regulations and the policies adopted by these companies.

6. Where we store your Personal Information

We store your personal information within the European Economic Area.

7. How long we store your Personal Information

PATH TO PARK retains personal data for 18 months after the end of the service, after this period all personal data will be destroyed. Financial data, more specifically information on the transactions you perform, is stored according to the fiscal term of seven (7) years and subsequently destroyed.

8. Cookies

We don't use cookies

9. Data collection by the use of Google Analytics

Our website utilizes Google Analytics, a web analysis service. Both Google and Google Analytics use so-called "cookies". Google Analytics collects information on your operating system, browser, IP address, the previous website visited (Referrer URL) and the date and time you visited our website. Google uses this information to analyse your use of our website, to compile reports on website activity for website operators and provide other services associated with website use and internet use. Google passes this information onto third parties where this is statutorily prescribed or where third parties process this data on behalf of Google. This use is anonymous or uses pseudonyms. Please find more information about this utilization form Google:

www.google.com/intl/de/privacypolicy.html

10. Collection and saving of usage data

We collect and store data, such as the date and time of the website access and the page from which you called up our site etc., to optimise our website. This is done anonymously without personally identifying the user of the site.

User profiles are also created by the use of pseudonyms. Here too, there is no link between the person behind the pseudonym and the usage data collected. We only collect this data for statistical purposes to further enhance our website and make our online presence even more attractive. This data is only collected and saved anonymously or under a pseudonym and cannot be traced back to you as an individual.

11. COMPLAINTS

For possible complaints about the processing of personal data by PATH TO PARK, you can submit a complaint to the French Data Protection Authority, CNIL through : <https://www.cnil.fr/>

Paris, May 25th 2018