

# Privacy policy

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KarLink Ltd and its subsidiaries (collectively, “KarLink”, “we”, or “us”) care about privacy and want you to be familiar with how we collect, use, process, and disclose your personal information. This Privacy Policy describes our privacy practices in connection with our websites and applications that link to this Privacy Policy (collectively, the “Services”) and our offline interactions with you in settings where we post this Privacy Policy.

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## Personal information we collect

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We collect three categories of personal information - personal information you give us; personal information automatically collected from your use of the Services; and personal information from third-party sources.

### Personal information you give us

**Account data.** When you register for an account with us, we require certain personal information to open your account, such as your name, email address, and password.

**Profile data.** We may also ask you to provide additional profile information to use certain features of the Services which may include street addresses, phone numbers, driver's license number, date of issuance and issuing country and/or state, profile photos, employer, city, biography, and date of birth. Certain parts of your profile (like your profile photos, employer, city, and biography) are part of your public profile page and will be publicly visible to others.

**Vehicle data.** We collect information you provide in relation to a vehicle such as vehicle listing details, vehicle identification number (VIN), vehicle location, availability dates, reviews, and uploaded trip photos.

**Payment data.** We collect your digital payment details, bank account or payment card numbers, and transaction information in connection with a potential or actual transaction, which may be processed and stored by one or more third party payment service providers or digital payments companies.

**Identity verification data.** In some instances, we may collect identity verification information such as a photograph or scanned copy of a driver's license, passport, national ID card, or payment card, social media account information, driver's/motor vehicle record, insurance information, or other forms of identification information. Where we request that you withhold certain information (such as obscuring or redacting aspects of identification information), please do so.

**Communications.** When you communicate with KarLink, including via phone, email, or chat, or use the Services to communicate with other users, we collect information about your communication and any information you choose to provide.

**User research and survey data.** We collect information you provide when you choose to participate in user research initiatives and/or community surveys. This may include demographic information if you choose to share it with us, video and/or audio recording, and written responses to prompts as part of a diary submission.

Personal information we automatically collect.

**Usage data.** We collect information about your interactions with the Services, such as the pages or other content you view, your log-in history, your searches, bookings you have made, how long you spent on a page or screen, sites from which you link or browse to in the Services, navigation paths between pages or screens, information about your activity on a page or screen, access time, duration of access, and other actions on the Services.

**Location data.** When you use certain features of the Services, we may collect information about your approximate location (e.g., city/town associated with your IP address). When you opt in to use our location sharing feature, we may collect the precise location information of your mobile device. Keep in mind that most mobile devices allow you to control or disable the use of location services by any application on your mobile device in the device's settings menu.

**Device data.** We collect information about your computer or mobile device, such as its operating system type and version number, manufacturer and model, browser type, screen resolution, IP address, unique device identifiers, or general location information such as city, state, or geographic area.

**Trip data.** We collect transactional information related to the trips you take through the Services, including the date and time of your trip, amounts charged, and other related trip details.

**Cookies and similar technology.** When you access the Services, we (including companies we work with) may place small data files on your computer or other device. These data files may be cookies, clear gifs, pixel tags, e-tags, "Flash cookies", or other local storage provided by your browser or associated applications (collectively "Cookies").

Personal information we collect from third-party sources.

**Third-party services.** If you choose to log in to our Services through a third-party site or service (e.g., Apple or Google), the third-party service may send us information such as your registration and profile information from that service. The information we may receive varies by service and is controlled by the relevant service. By associating an account managed by a third party with your KarLink account and authorizing KarLink to have access to this information, you agree that KarLink may collect, store, and use this information in accordance with this Privacy Policy. We are not responsible for how those third parties use and share your information. Please refer to the privacy policies of those third parties to understand how they use and share your personal information.

**Third-party in-vehicle devices.** If your vehicle, or a vehicle you book through the Services, includes an in-vehicle device or system operated by a third-party service (including vehicle manufacturers) or installed by the host, that host or service may record information about your use of the car. These devices or systems may monitor the car's condition, performance and operation, track fuel consumption, distance travelled, location, and other information. The host and/or third-party service will be solely responsible for its use of such information but may disclose such information to KarLink, which we will use in accordance with this Privacy Policy.

**Background check services.** To the extent permitted by applicable laws, KarLink may collect background information about you from public records, background check providers, or other screening services, including credit reports and information about criminal convictions or from sex offender registries. We may use your information, including your full name and date of birth, to obtain such reports.

**Other sources.** To the extent permitted by applicable law, we may receive additional information about you, such as demographic data, fraud detection information, or data from credit bureaus and other third-party data providers.

We may combine the information about you that we receive from third-party sources with other information we have about you.

## How we use your personal information

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We use, store, and process your personal information to provide and improve the Services and for security and safety purposes. For example, we may use your information:

To provide the Services, including to:

- Provide and operate the Services
- Provide customer support
- Provide staff training
- Send you service, support, and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you at any telephone number, by placing a voice call or through text (SMS) or email messaging
- Facilitate your login to the Services via third-party identity and access management providers, such as Google and Apple
- Process transactions and send notices about your transactions
- Personalize or customize your user experience
- Enable you to communicate with other KarLink users, including by sending them messages or other information during the booking process
- Facilitate your referral invitations
- Send your requests for reviews, for fraud detection and prevention, and for any purpose you authorize at the time of collection
- Administer referral programs, rewards, surveys, contests, or other promotional activities or sponsored events in which you participate

For research and development:

We may use your personal information to analyze and improve the Services and to develop new products and services, including by studying our user demographics of the Services. We may also create aggregated, de-identified, or other anonymous data from your personal information. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Services and promote our business.

For marketing and advertising:

We and our third party advertising partners may collect and use your personal information for marketing and advertising purposes:

**Direct marketing.** We may send you KarLink -related marketing communications as permitted by law. You will have the ability to opt-out of our marketing and promotional communications.

**Interest-based advertising.** We may contract with third party advertising and social media companies to display ads on the Services and other sites. These companies may use cookies and similar technologies to collect information about you (including the device data, online activity data, and/or geolocation data described above) over time across our Services and other sites and services or your interaction with our emails, and use that information to serve ads that they think will interest you. These ads are known as “interest-based advertisements”.

For security and safety, including to:

- Verify your identity or authenticate information that you provide, including during account creation and password reset processes
- Resolve disputes, collect fees, and troubleshoot problems
- Detect, prevent, and/or remediate fraud, abuse, security incidents, or other potentially harmful, prohibited, or illegal activities
- Determine your likelihood of getting into an accident or of making an insurance claim, such as by checking your auto insurance score
- Using information from your mobile or in-vehicle device to identify unsafe driving behavior, including speeding or harsh braking and acceleration, and to raise awareness regarding such behaviors
- Detect, prevent, or remediate violations of and enforce our [Terms of Service](#).
- Manage and protect our information technology infrastructure
- Conduct investigations and risk assessments
- Conduct checks against databases and information sources (such as but not limited to public government databases)
- Perform creditworthiness and solvency checks

To comply with law:

We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal processes, such as to respond to subpoenas or requests from government authorities.

With your consent:

In some cases, we may specifically ask for your consent to process your personal information.

We may also use your personal information as described elsewhere in this Privacy Policy or as disclosed to you at the time of collection.

## How we disclose your personal information

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With your consent

We may share your information at your direction or with your consent.

**Profiles, listings, and other public information**

Your public listing page on the Services will always include some basic information, such as your user ID or name associated with your account, your public profile photo, and for vehicle providers, the city where your car is located, your listing description, your calendar availability, transaction related information to allow our community to evaluate your reliability and responsiveness, and reviews or feedback about you. Your public listing page may also include aggregate demand information (such as number of page views over a period of time) and information about your cancellations. The Services may also display the approximate geographic pick-up location of your vehicle.

The Services allow your public profile and public listing pages to be included in search engines, in which case your public profile and public listing pages may be indexed by search engines and may be published as search results.

## Sharing between vehicle providers and hirers

KarLink enables vehicle owners and those authorized to offer and share vehicles with other individuals. If you agree to a booking through the Services, we may provide your information to the other party in that transaction as reasonably necessary to facilitate the transaction. For example, KarLink may provide your mobile phone number to facilitate communication, your driver's license information to confirm license validity and for identity verification, or your photograph to facilitate identification. We will also share the address of the vehicle and, if applicable, the proposed delivery location with the other party. If you used

## Service providers

We may share information with vendors and service providers who support the operation of the Services and business and who need access to such information to carry out their work for us (including, for example, web hosting, analytics, payment processing, email delivery, marketing, insurance, claims administration, vehicle recovery, roadside assistance, incident response, and customer support services). In some cases, the service provider may directly collect the information from you on our behalf.

## Third-party platforms and social media networks

If you have enabled features or functionality that connect the Services to a third-party platform or social media network (such as by logging in to the Services using your account with the third party, providing your API key or similar access token for the Services to a third party, or otherwise linking your Services account to a third party's services), we may disclose to the third-party platform or social media network the personal information necessary to facilitate the connection or that you authorized us to share. We do not control the third party's use of your personal information.

## Professional advisors

We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors, and insurers, where necessary in the course of the professional services that they render to us.

## Business transfers

We may sell, transfer, or otherwise share some or all of our business or assets, including your personal information, in connection with a business transaction (or potential business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganization, or sale of assets, or in the event of bankruptcy or dissolution.

## Responding to legal requests, preventing harm, and protecting our rights

We may disclose your personal information to courts, law enforcement, governmental or tax authorities, or third parties. We will make such disclosure to the extent we are required or permitted to do so by applicable law or where we consider such disclosure is reasonably necessary to comply with our legal obligations or legal process, to respond to claims asserted against us, and for the security and safety purposes described above. We may also disclose your information in response to valid legal requests relating to criminal investigations or alleged or suspected illegal activity or any other activity that may expose KarLink, you, or any other user, or to protect the rights, property, or personal safety of KarLink, our users, or others.

We may also disclose your personal information as described elsewhere in this Privacy Policy or as disclosed to you at the time of collection.

# Your preferences and choices

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## Communication preferences

You can control the methods by which we may contact you about your account, your booking and listing activities, promotions, and announcements in the Settings section within your KarLink account.

## Correct and update

You can review, correct, update, and edit certain information that has been previously provided to us by you at any time by logging in to your account and reviewing your account settings and profile. You can also access or request a correction of your information by contacting us. For your protection, we may need to verify your identity before implementing your request.

## Account closure

If you wish to close your account and request deletion of your personal information, please contact us at [support@mykarlink.com](mailto:support@mykarlink.com).

Please note that we may be unable to delete information needed to comply with applicable laws, detect or prevent fraud, collect any fees owed, resolve disputes, assist with or process claims, troubleshoot problems, assist with any audits and investigations, to enforce our [Terms of Service](#), and take other actions reasonably necessary, permitted, or required by applicable law. There may also be residual information that will remain within our databases and other records, which will not be removed.

## Access

You can request a copy of your personal information pursuant to any information access rights that you may have under applicable laws in your account page or by contacting us. We may request proof of identification or re-authentication to verify your access request.

## Interest-based advertising choices

Your choices for limiting use of your personal information for interest-based advertising include:

**Cookie preferences.** You may change your cookie preferences for KarLink 's website at any time via the cookie preferences link located in the webpage footer.

**Blocking cookies in your browser.** Most browsers let you remove or reject cookies, including cookies used for interest-based advertising. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. For more information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

**Blocking advertising ID use in your mobile settings.** Your mobile device settings may provide functionality to limit use of the advertising ID associated with your mobile device (e.g., Apple ID for Advertising or Google Advertising ID) for interest-based advertising purposes.

**Using privacy plug-ins or browsers.** You can block sites from setting cookies for interest-based ads by using a browser with privacy features, like Brave, or installing browser plugins like Privacy Badger, Ghostery, or uBlock Origin, and configuring them to block third party cookies/trackers.

**Advertising industry opt-out tools.** You can also use these opt-out options to limit use of your information for interest-based advertising by participating companies (but note we may work with companies that do not participate in these programs):

## Choosing not to share your personal information

Where we are required by law to collect your personal information, or where we need your personal information in order to provide the Services to you, if you do not provide this information when requested (or we later delete it at your request), we may not be able to provide you with the Services.

## Third-party platforms and social media networks

If you choose to connect the Services to a third-party platform or social media network, such as by using the third party's authentication service to log into your account on the Services, you may be able to control your settings through the third-party platform or social media network. If you withdraw our ability to access certain information from a third-party platform or social media network, that choice will not apply to information that we have already received from that third party.

## Security

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We employ a number of technical, physical, and organizational measures designed to protect information against unauthorized access, destruction, or alteration while it is under our control. However, no method of transmitting or storing information can be 100% secure and we cannot guarantee the security of your personal information.

## Other important information

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The Services are primarily controlled and operated from Zimbabwe. Your personal information may be used, stored, and processed in any country where we have facilities or in which we engage service providers. These locations may be outside of your state, province, or country of residence, and may have different and/or less protective data protection rules than those of your state, province, or country. As a result, this information may be subject to access requests from governments, courts, regulatory agencies, security authorities, or law enforcement in those jurisdictions according to the laws in those jurisdictions.

## Sensitive information

We ask that you not send us, and you not disclose, any sensitive information (e.g., Social Security numbers, social insurance numbers, passports, information related to racial or ethnic origin, or health) on or through the Services or otherwise to us unless specifically requested.

## Minors

The Services are not intended for anyone under the age of 21 and we do not knowingly collect personal information from users under the age of 21. If a minor under the age of 18 has already provided us with personal information, his or her parent or guardian may contact us to request that we delete it.

## Third-party privacy practices

This Privacy Policy addresses only the use and disclosure of information collected by KarLink. This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any site or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates. If you disclose your information to others, or if you are directed to a third-party website, their privacy notices and practices will apply. Some areas of the Services implement Google Maps/Places mapping services, including the Google Places API. In addition, to fight spam and abuse of the Services, KarLink has implemented reCAPTCHA Enterprise, a Google service. Your use of the Services is subject to [Google's Privacy Policy](#).

## Translations

Where KarLink has provided you with a version of this Privacy Policy in a language other than English, in case of any wording discrepancies between such version and the English version, the English wording takes precedence

# Changes to this privacy policy

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We may change this Privacy Policy. Please take a look at the "Last revised" legend at the top of this page to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the Services or as otherwise indicated. Your use of the Services following these changes means that you accept the revised Privacy Policy. If you don't agree to these changes, you can contact us to close your account.

# Information for California residents

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**Scope.** This section applies only to California residents entitled to receive the information in this section under the California Consumer Privacy Act of 2018, including as amended under the California Privacy Rights Act of 2020 ("**CCPA**"). It describes how we collect, use, and share Personal Information of California residents when we act as a "business" as defined under the CCPA, and their rights with respect to their Personal Information. For purposes of this section, "**Personal Information**" has the meaning given in the CCPA but does not include information excluded from the scope of the CCPA. In some cases, we may provide a different privacy notice to certain categories of California residents, such as job applicants, in which case that notice will apply instead of this section.

**Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.

**Deletion.** You can request that we delete the Personal Information that we have collected from you.

**Correct** You can request that we delete update or correct inaccuracies in your Personal Information.

**Non-discrimination.** You are entitled to exercise the rights described above free from discrimination in the form of any unlawful denial of service, increase in the price of services, decrease in service quality, or suggestion that you may be penalized for exercising your rights.

## We do not sell your Personal Information

Based on our understanding of the term "sell" under the CCPA, we do not sell personal information to third parties and have not sold Personal Information during the twelve months preceding the "last revised" date of this Privacy Policy. However, like many companies online, we use services provided by Google, Meta, and others that help deliver interest-based ads to you. We describe how you can opt-out of use of your Personal Information for interest-based advertising in the section entitled interest-based advertising choices. You may at any time indicate that you do not want us to sell your Personal Information or share or disclose your Personal Information for online targeted advertising activities.

## How to exercise your rights

You can request to exercise your information, access, and deletion rights by contacting us at [support@mykarlink.com](mailto:support@mykarlink.com).

We may decline your request where required or permitted by law. We will need to confirm your identity to process your requests and we reserve the right to confirm your identity.

**Legal bases for processing.** The legal bases of our processing of your personal information as described in this Privacy Policy will depend on the type of personal information and the specific context in which we process it. If you have questions about the legal basis of how we process your personal information, contact us at [support@mykarlink.com](mailto:support@mykarlink.com).

**Use for new purposes.** We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

**Retention.** We retain personal information where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested; to comply with applicable legal, tax,

or accounting requirements; to establish or defend legal claims; or for fraud prevention). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## Your rights.

The data protection laws of Zimbabwe give you certain rights regarding your personal information. You may ask us to take the following actions in relation to your personal information that we hold:

**Access.** Provide you with information about our processing of your personal information and give you access to your personal information.

**Correct.** Update or correct inaccuracies in your personal information.

**Delete.** Delete your personal information.

**Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.

**Restrict.** Restrict the processing of your personal information.

**Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or our response to your requests regarding your personal information, you may contact us at [support@mykarlink.com](mailto:support@mykarlink.com) or submit a complaint to the data protection regulator in your jurisdiction.

## Cross-Border Data Transfer

To facilitate our operations and provide the Services, we may transfer, store, and process your information within our family of companies, partners, and service providers, which may be based outside of Zimbabwe. If we transfer your personal information such that we are required to apply additional safeguards to your personal information under other data protection laws, we will do so, for example, by implementing the standard contractual clauses adopted by the European Commission.