



**Mom On Wheels**

**PRIVACY POLICY**

**Updated: July 3, 2016**

**MoM Privacy Policy**

Mom On Wheels {MoM} has created this privacy policy in order to demonstrate our commitment to you, our user, regarding your privacy with respect to information that you submit through our mobile application (“**Application**”), our website (“**Site**”) and related services through the Application (“**Services**”). Capitalized terms not defined in this Privacy Policy will have the meaning ascribed to them in our Terms of Use (“**Terms of Use**”).

Our core priority is Privacy Protection.

This Privacy Policy explains our practices regarding the collection, use and disclosure of information that we receive when you use our Services. This Privacy Policy does not apply to any third-party websites, services or applications, even if they are accessible through our Services. Any information that we collect is subject to the privacy policy in effect at the time that information is collected. We may, however, modify and revise this Privacy Policy from time to time. If we make any material changes to this Privacy Policy, we’ll notify you of those changes by posting them on the Services or by sending you an email or other notification, and we will indicate when those changes will become effective. Also, please note that, unless we define a term in this Privacy Policy, all capitalized words used in this Privacy Policy have the same meanings as in our Terms of Service.

“**Personal Information**” means contact information (i.e., your name, address, email address, and/or mobile or telephone number) and any other non-public information that is used or intended to be used to personally identify an individual, and any other non-public information that is associated with that information. “**Anonymous Information**” means information that is not used or intended to be used to personally identify an individual.

**A Note to Users Outside of the United Kingdom. BY USING OUR APP OR SERVICES OR SUBMITTING PERSONAL INFORMATION THROUGH OUR APP OR SERVICES, YOU AGREE TO THE TERMS OF THIS PRIVACY POLICY AND YOU EXPRESSLY CONSENT TO THE PROCESSING OF YOUR PERSONAL INFORMATION ACCORDING TO THIS PRIVACY POLICY. YOUR PERSONAL INFORMATION MAY BE PROCESSED BY US OR ON OUR BEHALF IN THE COUNTRY WHERE IT WAS COLLECTED AS WELL AS OTHER COUNTRIES (INCLUDING THE UNITED KINGDOM) WHERE LAWS REGARDING PROCESSING OF PERSONAL INFORMATION MAY BE LESS OR MORE STRINGENT THAN THE LAWS IN YOUR COUNTRY.**

## **REPRESENTATION AND OUR POLICY TOWARD CHILDREN**

The Application, Site and Services are not directed to children and children are not eligible to use our Sites and Services. Protecting the privacy of children is very important to us. We do not collect or maintain Personal Information from Users we actually know are under 13 years of age, and no part of our Sites and Services is designed to attract people under 13 years of age. Our Services are designed for parents or guardians and only parents and guardians should use our Services. If you believe that we might have any Personal Information collected from a child under 13, please contact us at [support@mom-on-wheels.co.uk](mailto:support@mom-on-wheels.co.uk).

As a Member, if you register an Account Passenger, we'll request that you provide us with certain information that can be used to identify such person, such as name, photo, age, phone number, and email address. In the event the Account Passenger is a child under the age of 13, by providing such information about the child, you affirm that you are such child's parent or guardian and have all requisite authority to provide us with such information and to authorize us to use such information. In order to provide your Rides, you also acknowledge that, as noted above, we will pass certain of this information on to the Drivers who provide your Rides. Drivers will have access to a MoM provided phone number to allow the Driver to communicate with such Account Passengers, including Account Passengers who are children (however, the Account Passenger's actual phone number will not be provided directly to the Driver), the Account Passenger's first name and last initial, the Account Passenger's photo, as well as information regarding such Account Passenger's schedule (if it is the case) (e.g., the activities that the Account Passenger is engaged in immediately prior to or after the Ride). Drivers will be able to communicate directly with Account Passengers, including children under the age of

13, over the course of providing a Ride, via voice call and/or text message (through a masked phone number, and not the Account Passenger's actual phone number), as well as through in-person communication.

## **INFORMATION WE COLLECT {Collection & Use of Information}**

### **Personal Information**

Our primary goals in collecting information are to provide and improve our Services, to administer your use of the Services (including your Account, if you are a Member, and your Ride Contracts), and to enable you enjoy and easily navigate our Services.

In **general**, the Personal Information we gather enables us to provide the Services to you. For **Users & Members** - We collect Personal Information from you when you make or accept requests for Rides and otherwise use our Services. When you send an email or other communicate with Mom On Wheels, we may retain those communications in order to process your inquiries, respond to your requests and improve our Services. For **Drivers** - We require certain Personal Information when you register with us, including billing or payment related information so we can process transactions and other information to determine your eligibility to be a Driver, though some of this information may be transmitted directly to our payment processor or other third party service provider. When you download the Application, we may collect your device type, your wireless carrier, and a device ID and we associate this with your Personal Information, though we primarily use this information to support your account and provide you with Services.

Therefore, **specifically**:

**User & Member Account Information.** If you create an Account to use the Services as a Member, we'll collect certain information that can be used to identify you, such as your name, email address, postal address, phone number and credit card number.

**Passenger Information.** We'll collect certain information about Account Passengers who are registered on the Services by Members in order to participate in Rides scheduled by such Members. We'll collect each such Account Passenger's name, email address, phone number and photograph.

**Driver Information.** If you create a Driver Account, we'll collect information that can be used to identify you, such as your name, NI Number, email address, postal address, phone number, photograph and payment account information, which all constitute PII. We'll also collect your date of birth and other non-PII, and will combine this information with PII we have about you. We may also collect additional information in order to perform (or have a third party perform) background checks. This additional information may include your NI and DVLA History.

When you download the Application, we may collect your device type, your wireless carrier, and a device ID and we associate this with your Personal Information, though we primarily use this information to support your account and provide you with Services. In addition, location-based information is collected through the Application, including, but not limited to geographic areas and other traffic and transportation-related data. If you are a Driver, the Application will enable us to collect your GPS coordinates during a Ride. Most GPS enabled mobile devices can define one's location to within 50 feet. This information will be also associated with the applicable User for any specific Ride. You can choose not to provide us with certain information by disabling this functionality, but this may limit the features of the Application or Services you are able to use. For example, Drivers cannot provide Rides with this functionality disabled. We collect this information for various purposes – including improving and enhancing our Services and for our internal business purposes.

If you participate in a contest or giveaway with us, we may ask you for your e-mail address and/or home number (to notify you if you win or not). We may also ask for first and last names, and sometimes post office addresses to verify your identity. In some situations, we may need additional information as a part of the entry process, such as a prize selection choice. These contests are voluntary. We recommend that you read the rules for each contest that you enter. If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.

To the extent you post Personal Information in comments in a publicly available area of our Services (e.g., feedback and reviews), it will be available to other users of the Services who may use it at their discretion. Please be thoughtful about the information that you post in any forums or comments.

## **Use of collected information**

Our Services are designed to connect Users and Drivers for Rides. As such, if you are a User, we must share Personal Information about you and the Riders to Drivers and if you are a Driver, we must share some of your Personal Information with the User. You hereby authorize all such disclosures. We request that Users use this information for the purposes of provision of, obtaining or providing the Ride and not store this information beyond the duration of the individual Ride provided. This information does not include billing information. We process payment with a third-party payment processor and then transmit payment to the Driver.

This Privacy Policy addresses only our use and disclosure of information we collect from and/or about you. When you authorize us to disclose information to other Users, the use and disclosure restrictions contained in this Privacy Policy will not apply to them. While we encourage them to comply with our data protection requirements, we will not be responsible if these Users fail to comply with respect to your information. We do not control the privacy policies or actions of third parties, including Users. Any complaints or inquiries regarding use of your information by a User should be addressed directly to the User in question.

Our primary purpose in collecting Personal Information is to provide you with the Services. We may use your Personal Information to:

- Administer your account;
- Determine your eligibility to participate in the Services;
- Assist in the arrangement of Rides;
- Provide the Services and customer support you request;
- Process transactions and send notices about your transactions;
- Resolve disputes, collect fees, and troubleshoot problems;
- Prevent potentially prohibited or illegal activities, and enforce our Terms of Use;
- Market our products and services (and those of third parties) to you that we believe may be of interest to you, though we will not disclose your Personal Information in doing so (although we allow advertisers to choose the characteristics of users who will see their advertisements and we may use the attributes we have collected to select the appropriate audience for those advertisements);
- Customize, measure, and improve our Services and Application; or

- Send you service update notices, and information based on your communication preferences.

We may also use your Personal Information to create Anonymous Information records by excluding information that makes the information personally identifiable to you.

Our Services are city-specific and can provide helpful information based on where you are. If you tell us where you are (i.e., by allowing your mobile device to send us your location), we may use that information to provide you with location-based information. If you want to deactivate this feature, you can disable location services on your mobile device, please contact your carrier for more information.

You can opt out of receiving certain communications from the Services such as our newsletter by clicking the “Unsubscribe” link at the bottom of each email or emailing us at [support@mom-on-wheels.co.uk](mailto:support@mom-on-wheels.co.uk). Please note that even if you unsubscribe or opt-out, we may still send you order, Application and Service related communications (e.g., emails related to your Rides or comments).

### **Anonymous Information**

We reserve the right to use Anonymous Information for any purpose and disclose Anonymous Information to third parties in our sole discretion.

### **How we share Personal Information with other parties**

In addition to the ways we share Personal Information with Drivers, we may share your Personal Information with other third parties in the following manners:

- Third Parties Designated by You. When you use the Services, the Personal Information you provide will be shared with the third parties that you authorize to receive such information, including as set forth above.
- Third Party Service Providers. We may share your Personal Information with our third party service providers that help us provide Services that we offer you.
- Affiliates. We may share some or all of your Personal Information with our parent company, subsidiaries, joint ventures, or other companies under a common control (“Affiliates”), if we have such Affiliates in the future, in which case we will require our Affiliates to honor this Privacy Policy.

- **Corporate Restructuring.** We may share some or all of your Personal Information in connection with or during negotiation of any merger, financing, acquisition or dissolution, transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Information may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the Personal Information collected by us and will assume the rights and obligations regarding your Personal Information as described in this Privacy Policy.
- **Other Disclosures.** Regardless of any choices you make regarding your Personal Information (as described below), we may disclose Personal Information if it believes in good faith that such disclosure is necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on us; (c) to protect or defend our rights or property or other users of the Services; and/or (d) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Use.

**Information Collected by Our Servers. *{Information Collected Using Cookies and other Web Technologies}***

To make our Application and Services more useful to you, our servers (which may be hosted by a third party service provider) collect information from you, including your browser type, operating system, Internet Protocol (“IP”) address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit.

**Log Files.** As is true of most websites, we gather certain information automatically and store it in log files. This information includes IP addresses, browser type, Internet service provider (“ISP”), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to analyze trends, administer the Services, track users’ movements around the Services, gather demographic information about our user base as a whole, and better tailor our Services to our users’ needs. For example, some of the information may be collected so that when you visit the Application or the Services again, it will recognize you and the information could then be used to serve advertisements and other information appropriate to your interests.

**Cookies.** Like many online services, we use cookies to collect information. “Cookies” are small pieces of information that a website sends to your computer’s hard drive while you are viewing the website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience within our Services. This type of information is collected to make the Services more useful to you and to tailor the experience with us to meet your special interests and needs. If you decide at any time that you no longer wish to accept cookies from our Services for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. Consult your browser’s technical information. If you do not accept cookies, however, you may not be able to use all portions of the Services or all functionality of the Services.

**Pixel Tags.** In addition, we use “Pixel Tags” (also referred to as clear Gifs, Web beacons, or Web bugs). Pixel Tags are tiny graphic images with a unique identifier, similar in function to Cookies, that are used to track online movements of Web users. In contrast to Cookies, which are stored on a user’s computer hard drive, Pixel Tags are embedded invisibly in Web pages. Pixel Tags also allow us to send e-mail messages in a format users can read, and they tell us whether e-mails have been opened to ensure that we are sending only messages that are of interest to our users. We may use this information to reduce or eliminate messages sent to a user. We do not tie the information gathered by Pixel Tags to our users’ Personal Information.

### **Information Related to Use of the Services**

Our servers automatically record certain information about how a person uses our Services and Rides (we refer to this information as “**Log Data**”), including information about Members, Account Passengers, Drivers and non-Account holders (“**Users**”). Log Data may include information such as a User’s Internet Protocol (IP) address, browser type, operating system, the web page that a User was visiting before accessing our Services, the pages or features of our Services to which a User browsed and the time spent on those pages or features, location information, the links on our Services that a User clicked on and other statistics. We use this information to administer the Services and we analyze (and may engage third parties to analyze) this information to improve and enhance the Services by expanding their features and functionality and tailoring them to our Users’ needs and preferences. We also use the

IP Address to generate aggregate, non-identifying information about how our Services are used.

### **Location Information**

We collect and store information about where you are located by accessing the GPS information available through your mobile device. Location information is collected as you navigate through our Services and during Rides, including, but not limited to geographic areas. During Rides, the Driver's mobile phone will send GPS coordinates to our servers. Most GPS-enabled mobile devices can define one's location to within 50 feet. We collect this information for various purposes—including to determine the Ride Fees, to provide you with customer support, to send you promotions and offers, to enhance our Services and for our internal business purposes. For Account Passengers between the ages of 8 and 16, we may collect location information to better understand the routes frequented by such Account Passengers in order to improve and personalize our Services for such Account Passengers. We may also have features that allow Members to access the location information of their Ride participants (such as Account Passengers participating in the Ride and their Driver).

### **Collection of Information by Advertisers**

We may use third parties to serve ads on the Services. Certain third parties may automatically collect information about your visits to this and other websites, your IP address, your ISP, the browser you use to visit our Services (but not your name, address, e-mail address or telephone number). They do this by using Cookies or other technologies. Information collected may be used, among other things, to deliver advertising targeted to your interests and to better understand the usage and visitation of our Services and the other sites tracked by these third parties. This policy does not apply to, and we are not responsible for, Cookies or pixel tags in third party ads, and we encourage you to check the privacy policies of advertisers and/or ad services to learn about their use of Cookies and other technologies. If you would like more information about this practice and to know your choices about not having this information used by these companies, click here: <http://www.aboutads.info/choices>.

## **Mobile Services**

We may also collect non-personal information from your mobile device if you have downloaded our Application to your mobile device. This information is generally used to help us deliver the most relevant information to you. Examples of information that may be collected and used include your geographic location, how you use our mobile services(s), and information about the type of device you use. This information is sent to us as aggregated information and is not traceable to any individual and cannot be used to identify an individual.

## **Disclosure – Analytics**

We may also use third party tracking services to help us analyze how users use the Application and Services. These services collect only the unique device identifier assigned to your mobile device, rather than your name or other personally identifying information, and use it to collect information such as how often users open the Application and what features they use in the Application. Only these services know and associate you (on a non-identifiable basis) with your identifier. For example, Google Analytics collects only the IP address assigned to you on the date you visit the Services, rather than your name or other personally identifying information. Although Google Analytics plants a persistent Cookie on your web browser to identify you as a unique user the next time you visit the Services, the Cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to the Services is restricted by the Google Analytics Terms of Use and the Google Privacy Policy.

## **Information Share With Third Parties**

We will not share any Personal Information that we have collected from you except as described below:

### **Information Shared with Our Services Providers**

We may engage third party service providers to work with us to administer and provide the Services. We currently use Braintree as our third-party payments processor. These third-party services providers have access to your and Account Passenger's PII only for the purpose of performing services on our behalf.

## **Information Shared with Drivers and Members**

We share certain information about Members and Account Passengers with Drivers so that they can effectively provide Rides. This information includes the first name and last initial of the Member and Account Passengers participating in the Ride, a MoM provided phone number that enables the Driver to communicate with the Member and Account Passengers, as well as a photo and the home address, pick up address and/or destination address of the Member or Account Passengers participating in the Ride. While MoM takes certain precautions to limit Drivers' retention of Members and Account Passengers' Personal Information (such as masking the phone numbers of Members and Account Passengers), such Drivers may be able to retain certain information learned over the course of providing a Ride, including after the Ride is complete. If you are a Driver, your name and photo will be shared with Members and Account Passengers, along with a MoM provided phone number, prior to the provision of the Ride so that you can be effectively identified and contacted in connection with the Ride.

## **Information Shared with Third Parties**

We may share aggregated information and non-identifying information with third parties for industry research and analysis, demographic profiling and other similar purposes. We may also share this information in order to deliver relevant advertising and promotional offers to you, your Account Passengers and to other users of our Services.

## **Disclosure to Third Party Companies**

We may enter into agreements with companies that desire access to Personal Information that we collect from you. AS A RESULT, WE MAY PROVIDE YOUR PERSONAL INFORMATION TO SUCH THIRD PARTY COMPANIES. BECAUSE WE DO NOT CONTROL THE PRIVACY PRACTICES OF THESE THIRD PARTY COMPANIES, YOU SHOULD READ AND UNDERSTAND THEIR PRIVACY POLICIES.

## **Information Disclosed in Connection with Business Transactions**

Information that we collect from our users, including Personal Information, is considered to be a business asset. As a result, if we go out of business or enter bankruptcy or if we are acquired as a result of a transaction such as a merger,

acquisition or asset sale, your and Account Passenger's Personal Information may be disclosed or transferred to the third-party acquirer in connection with the transaction.

### **Information Disclosed for Our Protection and the Protection of Others**

We cooperate with government and law enforcement officials or private parties to enforce and comply with the law. We may disclose any information about you or Account Passenger to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate: (i) to respond to claims, legal process (including subpoenas); (ii) to protect our property, rights and safety and the property, rights and safety of a third party or the public in general; and (iii) to stop any activity that we consider illegal, unethical or legally actionable activity.

### **Information We Disclose With Your Consent or at Your Request**

We will share your Personal Information with third-party sites or platforms, such as social networking sites, if you have expressly requested that we do so.

### **Email, Text and Voice Communications with Member**

Email communications and text messages sent from us or through us are designed to make your MoM experience more excellent. By becoming a Driver or a Member, you specifically agree to accept and consent to receiving email communications, telephone calls and text messages initiated from us or through us, which include, without limitation: message notification emails, emails or text messages informing you about your Rides and emails or text messages informing you of promotions we run and new and existing features we provide. Standard text messaging charges applied by your cell phone carrier will apply to text messages we send. If you change your mobile phone service provider, the notification service may be deactivated for your phone number and you may need to re-enroll in the notification service. MoM reserves the right to cancel the notification service at any time. If you do not wish to receive any of our email communications or text messages, please do not use the Services.

## **Email, Text and Voice Communications with Account Passenger**

As a User or Member, on behalf of an Account Passenger, you specifically agree and authorize MoM to send Account Passenger email communications, telephone calls and text messages initiated from us or through us, which include, without limitation: message notification emails, emails, telephone calls or text messages informing an Account Passenger about a particular Ride. Standard text messaging charges applied by Account Passenger's cell phone carrier will apply to text messages we send. You represent and warrant that you have obtained the permission and consent of the Account Passenger to provide Personal Information about the Account Passenger to us, including the Account Passenger's telephone number. If an Account Passenger changes the mobile phone service provider, the notification service may be deactivated for the phone number and you may need to re-enroll the Account Passenger in the notification service. MoM reserves the right to cancel the notification service at any time. If the Account Passenger does not wish to receive any of our communications, please do not register Account Passenger to your Account.

## **Anonymous Information**

We reserve the right to disclose Anonymous Information publicly without restriction.

## **YOUR CHOICES REGARDING YOUR INFORMATION**

### **Email Communications**

We may periodically send you free newsletters and e-mails that directly promote the use of our Application or Services. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to "opt-out" by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly (please see contact information below). Despite your indicated e-mail preferences, we may send you service related communications, including notices of any updates to our Terms of Use or Privacy Policy, which you may not opt out of.

## **Cookies**

If you decide at any time that you no longer wish to accept cookies from our Services for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. Consult your browser's technical information. If you do not accept cookies, however, you may not be able to use all portions of the Services or all functionality of the Services.

## **Changing or Deleting Your Personal Information**

You may review, update, correct or delete the Personal Information in your account by contacting us. If you completely delete all of your Personal Information, then your account may become deactivated. We will use commercially reasonable efforts to honor your request. We may retain an archived copy of your records as required by law or for legitimate business purposes. Please remember, however, if we have already disclosed some of your Personal Information to third parties, we cannot access that Personal Information any longer and cannot force the deletion or modification of any such information by the parties to whom we have made those disclosures. Certain information is necessary in order for us to provide the Services; therefore, if you delete such necessary information you may not be able to use the Services.

## **The Security of Your Information**

We take reasonable measures to protect the information that we collect from or about you and Account Passenger (including your and Account Passenger's Personal Information from unauthorized access, use or disclosure. Please be aware, however, that no method of transmitting information over the Internet or storing information is completely secure. Accordingly, we cannot guarantee the absolute security of any information.

## **Links to Other Sites**

Our Services may contain links to other websites and services. Any information that you provide on or to a third-party website or service is provided directly to the owner of the website or service and is subject to that party's privacy policy. Our Privacy Policy does not apply to such websites or services and we are not responsible

for the content, privacy or security practices and policies of those websites or services. To protect your information, we recommend that you carefully review the privacy policies of other websites and services that you access.

### **Modifying Your Information**

You can access and modify the Personal Information associated with your User Account or Driver Account and about your Account Passengers by logging into your User Account or Driver Account on the Services. If you want us to delete the Personal Information on your User Account, Member Account or Driver Account, you may cancel your account via your account settings in the App. We will take steps to delete the Personal Information as soon as is practicable, but some information, such as information regarding your and/or your Account Passengers' use of the Services, may remain in archived/backup copies for our records or as otherwise required by law.

### **FEEDBACK**

If you provide feedback to us, we may use and disclose such feedback in accordance with the terms in our Terms of Use, provided we do not associate such feedback with your Personal Information. We will collect any information contained in such feedback and will treat the Personal Information in it in accordance with this Privacy Policy, provided that we may contact you in regards to such feedback.

### **THIRD PARTY SITES AND SERVICES**

The Services may contain links to other websites and services. MomOnWheels is not responsible for the privacy practices or the content of these other websites. This Privacy Policy applies solely to information collected by us through the Services and does not apply to these third party websites. We encourage you to read the privacy policies of each and every website you visit. You should always use caution and common sense when choosing to provide Personal Information on the Internet, particularly when it comes to information such as credit cards and other payment information. The ability to access information of third parties from the Services is for your convenience and does not signify our endorsement of such third parties, their services, other websites, locations or their contents.

## **NOTIFICATION OF CHANGES**

This Privacy Policy is subject to revision from time to time on a going-forward basis. We will post any revised version of the Privacy Policy on this page. If we make any material changes to it, we will also send you notice thereof to the last email address you have provided to us. Continued use of our Services following notice of such changes will indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

## **ADDITIONAL INFORMATION {Questions & Clarification}**

Please contact us at [support@mom-on-wheels.co.uk](mailto:support@mom-on-wheels.co.uk) if you have any questions or require additional clarification about our Privacy Policy.

Last Updated: July 3 2016