PRIVACY POLICY

UBESECURE INC is committed to protecting its visitors' and Users' privacy. The following Privacy and Cookie Policy outlines the information UBESECURE INC (hereafter '**UBESECURE**', "**we**", or "**us**") may process and how we may use that information to better serve visitors and Users while using our website <u>www.ubesecure.com</u> (the '**Website**') our mobile customer application (the '**App**') and our ondemand services (collectively the "**Service**"). Please review the following carefully so that you understand our privacy practices.

This Privacy and Cookie Policy was last updated on **June 14, 2019**. If you have questions about this Privacy and Cookie Policy, please contact us at legal@ubewise.se.

1. DEFINITIONS

"User" means a person who has signed up and is registered with UBESECURE for the use or potential use of the Product/Service.

"Partner" means the party having sole responsibility for the driving transportation service.

"Driver" means the person who is an employee or business partner of, or otherwise retained by the Partner and who provides the ride to the User.

'**Vehicle**' means a vehicle that is owned and/or used by a Partner to provide the ride or to provide other services.

2. GENERAL

USA Federal and State Data Protection Authorities are the controllers of your personal data should be handled and UBESECURE process your personal data based on our understanding of these laws on our Website and App.

NOTIFICATION

UBESECURE has notified respective authority of the processing of personal data by UBESECURE. The notification indicates what data are processed by UBESECURE., and for what purpose, and to which persons or entities the data will be provided. UBESECURE and all its suppliers (vendors) are registered and meet all EU, US Safe Harbor and international standards for safe and secure processing of personal data.

ISO/IEC 27001:2013

UBESECURE framework also complies with the International Organization for Standardization (ISO) and International Electrotechnical Commission (IEC) 27001:2013 standards which is a specification for an Information Security Management System (ISMS) regarding routines for the collection, use, discard and retention of personal data. UBESECURE has certified that it adheres to the ISO/IEC 27001 and Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. Learn more about ISO/IEC 27001 standard visit http://www.iso.org/iso/home/standards

CHILDREN UNDER THE AGE OF 18

UBESECURE cares about the safety of minors. Because the Service is not directed towards minors (under 18) they are not allowed to register with or use the Service, or provide personal data. We do not knowingly collect personal information from minors. If we discover that we have collected personal information from a minor (s), we will delete that information immediately.

3. WHY WE PROCESS YOUR PERSONAL DATA?

3.1 TECHNICAL AND FUNCTIONAL MANAGEMENT OF THE WEBB/ APP

UBESECURE facilitates for its members a real time ordering and payment platform of secure ground transport and additional services globally through its Website or Application. When you visit UBESECURE Webb/App, administrators' process technical data such as your IP-address, visited webpages, the internet browser you use, your previous/next visited websites and the duration of a visit/session to enable us to deliver the functionalities of the Webb/App. In addition, in certain instances the browser may prompt you for your geo-location to allow us to provide you with an enhanced experience. With this technical data our website administrators can manage the UBESECURE Webb/App, for instance by resolving technical difficulties or improving the accessibility of certain parts of the Webb/App. This way, we ensure that you can (continue to) find the information on the Website in a quick and simple manner. For this purpose we also use **cookies**. See paragraph 8 for our cookie policy. When you use our App, we also process technical data such as your IP-address, Device ID or MAC-address, and information about the manufacturer, model, and operating system of your mobile

device. We use this data to enable us to deliver the functionalities of the App, resolve technical difficulties, provide you with the correct and most up to date version of the App and to improve the function of the App.

3.2 CUSTOMER SERVICE

UBESECURE offers a membership service. When applying for membership to register as a User, we will first collect your name and email address. UBESECURE will then send a link to the email address you registered for authentication. Once authenticated you will be guided with the link to complete your personal information such as country, passport number, photo ID, mobile phone number, personal address, business address, emergency contact person information, your credit card number, expiry date and security code. Unless otherwise agreed, all applicants when applying are required to provide and maintain in their personal information two (2) valid IDs, a major credit card in combination with a valid Driver License, EU ID or Passport for continued use of the services of UBESECURE. Applicants' personal information is submitted for approval/disapproval by certified suppliers. Certified suppliers in collaboration with authorities in each country/city will approve or disapprove applicants' eligibility to order their secure services through the Webb/App. UBESECURE will use your email contact details to inform you of approval/disapproval and communicate with you in response to your inquiries. If approved, UBESECURE will also use your email to send you service-related announcements, for instance, if our Service is temporarily suspended for maintenance. We will use your registration information to create and manage your account at UBESECURE. UBESECURE in collaboration with suppliers/vendors will periodically conduct checks with authorities on all its members and we may deactivate your account if we suspect that you are involved, wanted or commit fraudulent or illegal acts or if you violate our terms of use of the UBESECURE Webb/App.

3.3 ENHANCING YOUR UBESECURE EXPERIENCE - *GEO-LOCATION INFORMATION*

When you use the App through your mobile device, and only if you have consented thereto, we will track your geo-location information, on a real time basis only. We use this information to allow us to, set your pick up location and send it to the requested Coordinator/Driver. Once you have been assigned a driver and your trip is confirmed, you will then be able to see and call the requested Driver approaching in your App in real time. We may also use this real-time geo-location information to address user/driver physical safety and security concerns or user/driver support, technical, or business

issues that may arise in the course of your use of the App. If you contact UBESECURE technical support service while on a ride, and it is necessary to use your real-time geo-location information to address your question, our support personnel will seek your consent before consulting your real-time geo-location.

If you do not consent to the tracking of your geo-location, you will still be able to use the basic features of ordering on the Web/App. You may at any time withdraw your consent in your UBESECURE account. Further, you can turn the geo-location tracking off at the device level, also temporarily. Your mobile device informs you when geo-location is tracked by displaying the GPS arrow icon.

UBESECURE always collect the Driver's geo-location information from the Driver's mobile device so if you are travelling in a vehicle we can track your geo-location indirectly. Because you are travelling in the Vehicle, this means we will also indirectly collect your location information. This information is necessary to calculate your fare, send you a receipt showing the route of the ride, allow you to view your trip history in your UBESECURE account, and handle complaints from you or Drivers. We will also use the Driver's geo-location information in an anonymized and aggregated form in order to generate statistical information and management information and to provide you with increased App functionality.

PERSONAL INFORMATION

Depending on the security level of transport you request via your use of the Webb/App, we provide your picture, first name, last name and passport identification number. If your request is for Security level 1 then only your name, picture and mobile number is provided to the security Driver for transportation so that the Driver may contact and find you. If you request Security level 2 (S2) or Security level 3 (S3) then your full name, passport identification number with photo to the authorizing authorities for permission to provide the services to you.

ΡΗΟΤΟ

Unless otherwise agreed you must upload a photo to your UBESECURE account, your photo will be viewable by the Driver who is picking you up so that the Driver is able to verify your identity. You may remove or replace your photo at any time by logging into your account on the Website.

TELEPHONE NUMBER AND PUSH NOTIFICATIONS

If you have requested a ride through the Website or the App, from the time that your ride request is confirmed/verified by the Coordinator/Driver, until you reach your destination, you and the Coordinator/Driver will have the ability to contact each other by phone. You will be able to see or call the driver arriving at your destination on the App.

3.4 PROCESSING PAYMENTS

When you register as a User, in order to process payments for your requests or rides, your credit card information is stored with BRAINTREE. BRAINTREE have the highest PCI certification level and it is verified by VISA, MASTERCARD and other credit card suppliers to secure code. BRAINTREE processing transfer over the internet complies with global banking standards which comprise of SSL-techniques and 128 encrypted bytes. UBESECURE itself may only collect the first six (the BIN numbers) and the last four digits of your credit card number, the expiration number and (for the US) your zip code. We use this information to prevent fraud.

3.5 MARKETING

UBESECURE may use your contact details to send you general updates regarding safety and security news, special offers and promotions of services. You may at any time opt-out of receiving these updates.

3.6 GENERATING MANAGEMENT INFORMATION AND STATISTICAL DATA

UBESECURE uses your personal data in an anonymized and aggregated form to closely monitor which features of the Service are used most, to analyze usage patterns and to determine where we should offer or focus our Service. We may share this information with third parties for industry analysis and statistics.

4. OUR DISCLOSURE OF YOUR INFORMATION

We may employ third party companies and individuals to facilitate or provide the Service on our behalf, to process payment, provide customer support, provide geo-location information to our Drivers, to perform Website-related services (e.g., without limitation, maintenance services, database management, web analytics and improvement of the Website's features) or to assist us in analyzing how our Service is used. These third parties have access to your personal information only to perform these tasks on our behalf and are contractually bound not to disclose or use it for any other purpose.

UBESECURE will disclose your personal data to the extent that this is legally required, or necessary for the establishment, exercise or in defense of legal claims and legal process; or in the event of an emergency pertaining to your health, security and/or safety.

5. YOUR RIGHTS

As a user, you have the right to information regarding your personal account, including information that you've provided to us and information regarding each ride requested via the Webb/App. You may at any time request correction or erasure of your personal data, and object to any processing of your personal data by emailing us at legal@ubesecure.com. We will respond to your access and/or correction request within four weeks. You may also amend your personal details and withdraw any given consent using your UBESECURE account.

6. RETENTION

Unless specified otherwise in this Privacy and Cookie Policy, we will retain your information until you cancel your UBEWISE account, or until your UBESECURE account has been inactive for a year. If you wish to cancel your UBESECURE account or request that we no longer use your information to provide you services, please contact us at support@ubesecure.com. Upon expiry of the one year period of inactivity, we will alert you and give you two weeks to re-activate your UBESECURE account or retrieve any personal information you want to keep. After deletion of your account we will anonymize your data, unless these data are necessary to comply with a legal obligation or resolve disputes.

7. SECURITY

UBESECURE has taken appropriate technical and organizational security measures against loss or unlawful processing of your personal data. To this purpose, your personal data are securely stored within our database, and we use ISO/IEC standard, industry-wide, commercially reasonable security practices such as encryption, firewalls and SSL (Secure Socket Layers) as well as physical safeguards of the locations where data are stored.

However, as effective as encryption technology is, no security system is impenetrable. We cannot guarantee the security of our database, nor can we guarantee that information you supply won't be intercepted while being transmitted to us over the Internet. Any transmission of information by you to UBESECURE is at your own risk. We recommend that you do not disclose your password to anyone.

8. COOKIE POLICY

The Website uses "cookies". A cookie is a small text file that we place on your computer or mobile device to enable various features of the Website. You can change your cookie settings to accept or not accept cookies in your browser settings.

THE WEBSITE USES THE FOLLOWING COOKIE CATEGORIES:

Essential: UBESECURE uses cookies necessary to enable or enhance certain functionality of the Website, such as recalling your recent actions on the Website or remembering your Website settings. If you have cookies disabled in your browser, these cookies will be blocked.

9. CHANGES IN THIS PRIVACY POLICY

We may update this privacy statement to reflect changes to our information practices. If we make any material changes we will notify you by email and by means of a notice on the Website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

10. CONTACT DETAILS

UBESECURE INC 1500 Market Street Philadelphia, Pa. 19102 Email: <u>support@ubesecure.com</u>