

Privacy Policy for Passengers

AVENUE (also referred to as "Company" "we", "our" or "us") – AVENUE is a technology branch of GOLD AVENUE LOGISTICS COMPANY a private limited company incorporated and registered under the laws of Republic of KENYA with registration number PVT-XYUQP8K, registered office Dagoreti Road , Africa Reit House 3rd Floor, Karen, Republic of KENYA and is the controller of personal data of passengers and has appointed a Data Protection.

1. Personal data we process

- Name, phone number, e-mail address.
- Geolocation of the passenger, the time and the destination of a journey.
- Payment information.
- Information about disputes.
- Identification data of the device on which the AVENUE app has been installed.

2. Purpose of the process

- We collect and process personal data for the purpose of connecting passengers with drivers to help them move around cities more efficiently.
- We display geolocation data and the phone number of passengers to drivers to enable efficient pick-up. Geolocation data is collected only when the AVENUE app is activated. The collection of geolocation data stops after closing the AVENUE app. In some countries drivers cannot see passengers' phone numbers; the driver sees an altogether different number which temporarily diverts to the passenger's phone number enabling the driver and passenger to communicate.
- We may use geolocation data to resolve quality issues related to transportation services.
- We use contact details to notify passengers of updates to the AVENUE app.
- We collect data of the routes taken by drivers and passengers to analyze the geographic coverage in order to provide recommendations to the drivers about most efficient routes.
- Your name, phone number and e-mail will be used to communicate with you.
- We obtain payment details to process passengers' payment on behalf of drivers for transportation services.
- Customer support data is collected on a case-by-case basis and stored for the purpose of resolving disputes and service quality issues.

3. Legal Basis

- Personal data is processed in order to provide the service contracted with passengers. We collect and processes the personal data submitted by the passengers in the course of installation and use of the AVENUE app. The prerequisite for the use of AVENUE services is passengers agreeing to the processing of identification and geolocation data.

- Personal data may be also processed on legitimate interest grounds, for example in investigating and detecting fraudulent payments.

4. Recipients

- The personal data of passenger is only disclosed to driver who has activated AVENUE app; in such case, driver will see the name, phone number (in some countries the number is masked) and geolocation data of the passenger.
- After providing the transportation service, the name and the telephone number (in some countries the number is masked) of the passenger will remain visible to the driver for 24 hours. This is necessary for drivers to resolve any issues associated with service provision, e.g., to contact the passenger if something was left behind in the vehicle.
- Feedback given by passengers regarding the quality of the service is anonymous and drivers do not receive names and telephone numbers of the passenger who provided rating and feedback.
- Depending on the location of the passenger, the personal data may be disclosed to the AVENUE Technology and partners (local subsidiaries, representatives, affiliates, agents etc). Processing of personal data by AVENUE Technology and partners will occur under the same conditions as established in this privacy notice.

5. Security and access

- Any personal data collected in the course of providing services is transferred to and stored in the data centres of Gold Avenue Logistics Ltd. Only authorised employees of AVENUE Technology and partners have access to the personal data and they may access the data only for the purpose of resolving issues associated with the use of the services (including disputes regarding transportation services)
- AVENUE Technology and partners can access personal data to the extent necessary to provide customer support in the respective country.
- Geolocation data is processed in anonymized form and personalized only if the geographical location data is needed to be linked to a passenger for resolving disputes or fraud.
- For research and scientific purposes, the data is used in unidentified form (anonymized)

6. Access and correction

- You can access and update your personal data via the AVENUE app.

7. Retention

- Your personal data will be stored as long as you have an active passenger account. If your account is closed, personal data will be deleted (according to the policies set out in this

section) from the databases, unless such data is required to be retained for accounting, dispute resolution or fraud prevention purposes.

- Financial data regarding transportation services provided to passengers will be stored for 3 years after the last journey.
- Data required for accounting purposes will be stored for 7 years [after the last journey].
- In the event that there are suspicions of a criminal offence, fraud or false information having been provided, the data will be stored for 10 years.
- In case of payment disputes, data will be retained until the claim is satisfied or the expiry date of such claims.
- Journey history data will be stored for 3 years, after which the data will be anonymized.
- Please note that the deinstallation of AVENUE app in your device does not cause the deletion of your personal data.
- If the AVENUE app has not been used for 3 years, we will notify you and ask you to confirm whether account is still active. If no reply is received, the account will be closed and personal data will be deleted unless such data is required to be stored for accounting, dispute resolution or fraud prevention purposes.

8. Deletion

- You should also bear in mind that any request to delete your personal data is possible only if we delete your account. As a result of that you will not be able to use AVENUE app via an account which has been deleted.
- We respond to any request for to delete personal data submitted by e-mail within a month and will specify the period of data deletion.

9. Portability

- We will respond to any request for transfer of personal data submitted by e-mail within a month and specify when the data transfer will take place. After we have verified the customer in question, we will provide you with personal data, which includes: contact information, last 3 years' journey history and payment information.

10. Direct marketing

- We will only use your e-mail address and/ or phone number to send direct marketing messages if you have given us permission to do so via the AVENUE.eu website or via the AVENUE app. We may personalize direct marketing messages using the information how you use AVENUE services (frequency of use, journeys, payments).
- If you no longer wish to receive direct marketing messages, please click the "Unsubscribe" link in the footer of our e-mail or in profile section of the AVENUE app.

11. Dispute resolution

- Disputes relating to the processing of personal data are resolved through customer support (info@goldavenuelogistics.com) or by contacting AVENUE Technology Data Protection Officer (info@goldavenueafrica.com).
- The supervisory authority is the Gold Avenue Logistics Ltd which can be contacted by email info@goldavenelogistics.com.