Wrench Inc. Privacy Policy

Last Updated: May 15, 2023

Wrench, Inc., a Delaware corporation ("Wrench," “we” or “us”) has created this Privacy Policy in order to demonstrate our firm commitment to privacy (the "Privacy Policy"). This Privacy Policy is hereby incorporated in our Terms of Use and by registering for Services via the Wrench Platform, you accept the terms of this Privacy Policy. All capitalized terms not otherwise defined herein shall have the meanings given them in the Terms of Use.

This Privacy Policy applies Wrench website and related mobile applications and the websites or mobile applications any of its subsidiaries, including but not limited to YourMechanic, Inc., LemonSquad, Mobile Battery Solutions, or Southwest Inspections ("Wrench Platform"), any download or use of the Wrench Inc. Consumer, Technician or Fleet apps ("Wrench Inc. App" or "App") or by ordering any services from Wrench or any of its affiliates (the “Service”). By using the Wrench Platform, App, or Services, you acknowledge that you have read and agree to be bound by this Wrench Privacy Policy. If you do not wish to be bound by the terms of the Privacy Policy, you must cease any use of the Wrench Platform, App, or Services.

Notification of Changes

We may update this Privacy Policy from time to time as our services change and expand. If we update this Privacy Policy, we will post the updated Privacy Policy. Unless otherwise provided below, the revised Privacy Policy will take effect when it is posted. Once any changes become effective, your continued use of the Wrench Platform, App, or Services after such time will signify your acceptance of the new terms. If we are going to use your Personally Identifiable Information (as defined below) in a manner different from that stated at the time of collection, we will notify you, and you will have a choice as to whether or not we use your Personally Identifiable Information in such manner. In addition, if we make any material changes in our privacy practices that affect information already stored in our database, we will notify you of the change and solicit your express acceptance of that change.

The Wrench Platform Contains Links to Other Sites

We are not responsible for the privacy practices or the content of any other web sites to which the Wrench Platform links or which link to the Wrench Platform. By clicking on a link, logo, or other item, please note that you may no longer be on the Wrench Platform. To check what Internet location you
are on, note the URL at the top or bottom of your browser. We encourage you to read the posted privacy statements of all third party web sites as their privacy practices may be different.

**Information We Gather during Registration**

If you register an Account or apply to become a Technician, we collect and store information that you provide, including information that specifically identifies you or your account ("Personally Identifiable Information"). At this time, the most information you would be required to submit is your first name, last name, password, street address, city, state, zip/postal code, country, phone number, email address, and information about your vehicle such as: license plate, VIN (Vehicle Identification Number), make, model, year, and engine size. Technician applicants will also be asked to provide information about their repair skills and abilities to perform Vehicle Services. For tax purposes, Technicians are also required to provide their Federal Tax ID or Social Security Number (as applicable in the United States). Anyone wishing to pay for various fees or service retainers via credit card is also required to enter a valid credit card number and name as it appears on the credit card. Other information requested on our registration page, including the ability to receive promotional offers from us, is optional. We may, in the future, include other optional requests for information from you, to help us to tailor the Wrench Platform for you and deliver personalized information to you. We may supplement our information with additional information purchased from third parties for marketing purposes.

YOU MAY REQUEST THAT WRENCH DELETE YOUR PERSONAL DATA

You can ask Wrench to delete your personal data when the data the company holds on you is no longer needed or in the event your data has been used unlawfully. Wrench provides two (2) methods by which you may have your personal data removed;

a) Call this toll free number 1-877-572-4538, OR
b) Email privacy@wrench.com to request your personal data be deleted

Wrench will confirm receipt of a deletion request within 10 business days of receiving the request and to respond to requests to delete within 45 calendar days. You may use the same methods for any other questions or requests relating to use of your personal data or corrections to your personal data.

**Call and SMS Data**

Our Services facilitate communication between Wrench, our customers, and Technicians. In connection with facilitating this service, we receive call data, including the date and time of the call or SMS message, the parties' phone numbers, and the content of the SMS message.
Online Order Placement and Management

The private and shared areas of the Wrench Platform help to facilitate communication and the exchange and sharing of information between Wrench, our customers, and Technicians. The information contained in work orders is accessible by you, Wrench, and the contracting Technician. We may use non-Personally Identifiable Information from a work order (e.g., the scope of work or spend limit) for statistical analysis, product development, marketing, and research. We reserve the right to monitor communications throughout the Wrench Platform, and if we believe that anyone is violating any of our agreements; international, federal or state laws; or our stated policies, we may terminate such usage.

Online Surveys and Contests

Occasionally, we conduct online user surveys to collect information about our users' preferences. These surveys are optional, and if you choose to respond, your responses will be kept anonymous. Similarly, we may offer contests to qualifying people in which we ask for contact and demographic information such as name, email address, and mailing address. None of this information is shared with third parties, except in summary form, if at all. The demographic information that we collect in the registration process and through online surveys is used to help us improve our services to meet the needs and preferences of our customers and Technicians. This may include targeting advertising to you about our services. Information we gather through a contest may also be disclosed to third parties as necessary for prize fulfillment and other aspects of any contest or similar offering.

The Wrench Payment System

We offer a payment system that allows customers to pay with a credit card (the "Payment System"). If you make use of the Payment System, we will collect your credit card number and any additional entered financial institution information and will use that information to bill your services and to perform the billing operation on behalf of the Technician, including but not limited to the use and disclosure of such credit card number and information to third parties as necessary to complete such billing operation. In addition, Fleet Customers can pay using alternate mechanisms such as Automated Clearing House (ACH) or other mechanisms agreed upon with Wrench in advance.

Cookies and Automatically Gathered Information

Occasionally, we conduct online user surveys to collect information about our users' preferences. These surveys are optional, and if you choose to respond, your responses will be kept anonymous. Similarly, we may offer contests to qualifying people in which we ask for contact and demographic information such as name, email address, and mailing address. None of this information is shared
with third parties, except in summary form, if at all. The demographic information that we collect in
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parties as necessary for prize fulfillment and other aspects of any contest or similar offering.

Other Identifiers

When you use our app, we collect a unique ad-tracking identifier from your device (the Advertising
Identifier or “IDFA” on iOS devices and the Google Ad ID or “AID” on Android devices) so that we
can learn more about users of our app and provide the most relevant messaging and marketing.
Although these identifiers are unique to your device, they do not contain any of your personal
information, such as name or email address.

Technician Profile

As part of registration, Technicians may set up a profile describing their experience, rates, and
qualifications (“Technician Profile”). Some of the information requested, including photos, in the
Technician Profile registration is mandatory. If you decide to offer your services through Wrench, this
information and content may be used publicly. Wrench may use information in your Technician
Profile to help decide whether to make use of your services.

How We Use Registration Information

We use Personally Identifiable Information for our own internal purposes including contacting you to
inform you about updates to our services and providing you with information relating to transactions
that you conduct on the Wrench Platform. We reserve the right to disclose your information as
required by law.

We do not rent or sell Personally Identifiable Information to third parties. We may send you email
communications including information that we may think may be of interest to you, and we may
provide your email address to third party partners if we believe their products or promotions may be
of interest to you. You may opt out of receiving marketing emails at any time by modifying the
Preferences section of your customer profile or by clicking on the unsubscribe link in any marketing
email you receive from us. In addition, to improve our ability to serve you relevant ads across the
Internet for products that will be more interesting to you, we may provide your personal information
to our advertising agents that use your information solely for our advertising purposes.

We may disclose and transfer your Personally Identifiable Information to any successor-in-interest of
ours, such as a company that acquires our business. We may need to disclose your personal
information when required by law or when we have a good-faith belief that such action is necessary to comply with a judicial proceeding, a court order or legal process.

**Use of General Data**

We reserve the right to use the general data we obtain from your use of the Wrench Platform, including all statistical information. You acknowledge that such data belongs to us and that we shall have the right to use such data as we determine in our sole discretion.

**Third Party Partners**

We enter into relationships with third-party partners to provide products and services. We may share your Personally Identifiable Information with certain third party partners as required to provide a specific product or service that you request from such a partner. However, these third party partners may not use this Personally Identifiable Information for any reason other than to provide a service or product as ordered. If you establish an Account through a third party partner (e.g., on a co-branded registration page), it is our general policy not to share anything other than summarized or aggregated data with the partner; however, any Personally Identifiable Information you provide may also be received by the partner and could be stored and used by them according to their privacy policy. Please take the time to review these third party privacy policies.

**Transaction Intermediaries**

We use an outside credit card processing company to bill for retainers and services. We believe these companies do not retain, share, store, or use Personally Identifiable Information for any secondary purposes. We use commercially reasonable efforts to restrict transaction intermediaries from using Personally Identifiable Information for purposes unrelated to the Services.

**Technicians**

Work orders placed on the Wrench Platform are completed by third-party Technicians (“Technicians”). We may share the email addresses, phone numbers, or addresses of users and Technicians, along with other information necessary to complete a project, once a project is awarded on our Wrench Platform to enable work on the project to be completed. These Technicians are not allowed to use Personally Identifiable Information except for the purpose of providing Vehicle Services.

**Comments and Feedback Submitted by Users**
We constantly seek to improve the quality and user experience of the Service. We value your input and encourage you to help us expand and make improvements to the Wrench Platform and the Service by providing us with any thoughts or comments you might have regarding the Service or the operation of the Wrench Platform. You can submit any comments you have to us by emailing to hello@wrench.com. When sending us comments, we may receive your email address or User ID and the country in which you are located. This information is optional. If you provide this information, we will only use it to acknowledge or respond to your comments. Submitting comments via an email will not cause you to receive any secondary or promotional material unless specifically requested by you. In certain circumstances, we may ask for your permission to post your comments in marketing or promotional materials. We may send a request to receive Feedback on the Wrench Platform or the Service. You understand that information you provide as part of a feedback request, review, photo submission, or similar method will be available to other users and in some cases may be publicly available.

Security

We will use commercially reasonable methods to keep Personally Identifiable Information securely in our files and systems. Our payment site is operated using secure Internet connections, using SSL (Secure Sockets Layer) encryption, to help protect your financial data. We cannot, however, guarantee the security of your Personally Identifiable Information, particularly, as it travels over the Internet. As such, we encourage you to exercise caution in determining what information you disclose via the Internet.

Terminating Your Account

We save your Personally Identifiable Information until your account with us is terminated. To terminate your account, contact Wrench Customer Service as indicated on our contact page. If you terminate your account, your Personally Identifiable Information cannot be recovered, and you may continue to receive email communications for a short period of time until we have updated all of our databases. After termination of your account, your Personally Identifiable Information may remain on our archived database and records for a reasonable time as residual information. We will not use this residual information for business development purposes but we reserve the right to retain and use any data, including Personally Identifiable Information to the extent we deem it necessary for internal business purposes, including investigation and resolution of any disputes, and for legal or tax compliance obligations. We will maintain information on users who have been removed for violating any of our policies.

Correcting or Updating Your Information and Opting Out
This Wrench Platform gives the following options for changing and modifying information previously provided.

- You may update your registration information using the appropriate tools in the Wrench navigation bar.
- You may update your credit card information using the appropriate page on the Wrench Platform.

For other requests, please contact hello@wrench.com. Please provide sufficient information in your request so that we are able to address your questions or concerns about correcting information, deleting information, or opting out.

**Transmittal of Data**

Wrench primarily operates within the United States and Canada and the Wrench Platform, App, and Service are primarily intended for use within the United States and Canada. We reserve the right to transmit into the United States any and all data that is submitted by anyone outside the United States, including but not limited to Personally Identifiable Information, and you hereby expressly consent to the foregoing.

**Retention**

Wrench will retain your personal information:

- for as long as we have a customer relationship with you or as long as necessary to enable you to use the Website, App or Wrench Product(s);
- for the period required to provide Service that you request from us;
- for the period required to provide marketing or other promotional materials that you request from us;
- to comply with our legal obligations, including requirements of regulators and governmental agencies that have authority over us such as tax and accounting obligations, which usually require retaining certain transaction data for periods between 7 and 10 years after a transaction has occurred;
- for the period required to resolve disputes with any parties or to investigate or defend against potential legal claims; and
- for the period required to analyze historical Service request and parts failure analysis to deliver timely Wrench Predictive Preventative Maintenance services through the lifetime of a Vehicle in Operation (VIO), which usually requires retaining certain transaction data for periods between 10 and 15 years after a transaction occurred; and
- otherwise as necessary to allow us to conduct our business in compliance with applicable laws and regulations

All personal information we retain will be subject to this Privacy Policy and our internal retention guidelines. Wrench will delete your personal data when it is no longer required for the purposes
mentioned above. If we are unable to delete it for technical reasons, we will implement appropriate measures to prevent any further processing or use of such data. If you have a question about a specific retention period for certain types of personal information we process about you, please send an email to privacy@wrench.com.

Legal Disclaimer

Though we make every effort to preserve your privacy, we may need to disclose your Personally Identifiable Information when required by law, or when we have a good-faith belief that such action is necessary for the safety and security of any person, or to comply with a current judicial proceeding, subpoena, court order, or legal process.

Contacting Us

If you have any questions about this Privacy Policy or our privacy practices, you may contact us at privacy@wrench.com.