

Transfr Privacy Policy

Effective date: 11/14/2018

Turbo Technology, Inc. doing business as Transfr (“Transfr”, “we”, or “us”) respects your privacy and is committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide to us and our practices for collecting, using, maintaining, protecting and disclosing that information.

This policy applies to information we collect when you visit the website www.transfr.co and related social media (our “Website”); in email, text and other electronic messages between you and this Website (the “Messages”); through mobile and desktop applications you download from this Website which provided dedicated non-browser-based interaction between you and this Website (the “Applications”); when you interact with our advertising and applications on third-party websites and services if those applications or advertising include links to this policy (the “Third-party Sites”); and through phone communications with us (the “Other Communications”) (collectively the Website, Messages, Applications, Third-party Sites, and Other Communications are referred to herein as the “Site”). .

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Site. By accessing or using the Site, you agree to this privacy policy. This policy may change from time to time. Your continued use of the Site after we make changes is deemed to be acceptance by you of those changes, so please check the policy periodically for updates.

INFORMATION WE COLLECT

We collect several types of information from and about users of our Site, including information:

- By which you may be personally identified, such as name, postal address, e-mail address, telephone number, social security number, driver’s license number, passport number, or any other identifier by which you may be contacted online or offline (“Personal Information”);
- That is about you but individually does not identify you; and/or
- About your internet connection, the equipment you use to access our Site and usage details.

We collect this information:

- Directly from you when you provide it to us;
- Automatically as you navigate through the Site – information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons and other tracking technologies;
- From third parties including our business partners.

Information You Provide to us. The information we collect on or through our Site may include:

- Information that you provide by filling in forms on our Site.
- Records and copies of your correspondence if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through our Site and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Site.
- Your search queries on the Website.
- When you list your car with Transfr, we will ask you for certain additional information about your car, which may include a license plate, mileage and/or VIN and we may also require additional financial information from you to facilitate payment to you and to process any filings required by applicable tax authorities.
- When you rent a car through Transfr, we will ask you for payment information and information concerning your driver's license and driver's record. This information, in its entirety, is considered Personal Information.

You also may provide information to be published or displayed (hereinafter, "**posted**") on public areas of the Site, or transmitted to other users of the Site or third parties (collectively, "**User Contributions**"). Your User Contributions are posted on and transmitted to others at your own risk. We cannot control the actions of other users of the Site with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

We reserve the right to review and store the User Contributions and other communications you make through the Site. We may use those communications to better understand how members use the marketplace, as well as for security purposes and dispute arbitration. However, we are not obligated or required to review any User Contributions or other communications nor to take any specific action with respect to those communications. At its parking facility or affiliate parking provider's facility, Transfr may take photos of your vehicle, as well as any items or equipment you may have inside the vehicle when you drop it off with us. These photos will be stored securely and will only be used in the event of a dispute between the owner and renter about the condition of a vehicle, or to assist any of Transfr's insurers in an insurance claim on a particular vehicle. This information is also considered Personal Information.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Site, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

The information we collect automatically is statistical data and may include Personal Information and we may maintain it or associate it with Personal Information we collect in other

ways or receive from third parties. It helps us to improve our Site and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies.
- **Web Beacons.** Pages of the Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We do not collect Personal Information automatically, but we may tie this information to Personal Information about you that we collect from other sources or you provide to us.

THIRD-PARTY USE OF COOKIES AND OTHER TRACKING TECHNOLOGIES.

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. The information they collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

HOW WE USE YOUR INFORMATION

We use information that we collect about you or that you provide to us, including any Personal Information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your subscription, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.

In any other way we may describe when you provide the information.

To facilitate our administration and operation of the Service:

- To understand better how our users engage with the marketplace.
- To verify your account information.
- To process your requests and transactions.
- To provide you with information or services you request.
- To inform you about other promotions or products or services we think will be of interest to you.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please check the relevant box located on the form on which we collect your data.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your Personal Information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

Transfr will use third party services to verify the Personal Information you provide to us and to obtain additional related information and corrections where applicable. By entering this information on the Site, you hereby authorize Transfr to request, receive, use and store such information for a reasonable period of time, or as required by law in the State of California. In addition, you agree that Personal Information provided by you may be linked together or merged with other Personal Information so that we may better understand of your eligibility for and use of an account. In any case, this Privacy Policy governs any information we maintain about you and your use of the marketplace.

DISCLOSURE OF INFORMATION

Transfr does not sell, trade, or rent your Personal Information to others. We will not share the Personal Information we collect from you through the marketplace with third parties except as described in this Privacy Policy. When you rent a vehicle through the Transfr Site and Service, Transfr may provide your Personal Information to the owner of the vehicle in that transaction as reasonably necessary to facilitate the rental. For example, Transfr may provide your profile photo, email address, or mobile phone number to improve the experience for both parties. In addition to information verification providers described above, we may share Personal

Information with vendors, service providers, contractors, and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them. Transfr compiles information about the use of the Site and Services. In other words, information about how you use the Site and Services may be collected and combined with information about how others use the same. Aggregate data helps us improve our Site and Service for all of our users and helps us decide which new features to deploy first. Transfr may also share aggregate demographic information with advertisers, partners, investors, and other relevant parties without restriction. This policy in no way restricts or limits our collection and use of aggregate information. Please note that when you use the site, information you post may be publicly available for others to view. Please be mindful of what you post.

In addition, we may disclose Personal Information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Transfr's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Transfr about our Site users is among the assets transferred.
- To third parties to market their products or services to you if you have consented to these disclosures. We contractually require these third parties to keep p
- Personal Information confidential and use it only for the purposes for which we disclose it to them.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Transfr, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

SECURITY

We have endeavored to put into place reasonable security measures in an effort to protect Personal Information while it is under our control. We are not responsible for any unauthorized disclosure of personal or other information caused by any third party. Your account information is accessible online through the use of a password. To protect the confidentiality of Personal Information, you must keep your password confidential and not disclose it to any other person. You are responsible for all uses of our Site by any person using your password. Please advise us immediately if you believe your password has been misused.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Website. Any transmission of Personal Information is at

your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Site.

LOG DATA

When you visit the Site and Application, whether as a registered or a non-registered user, our servers automatically record information that your browser sends whenever you visit a website ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type or the webpage you were visiting before you came to our Site, pages of our Site that you visit, the time spent on those pages, information you search for on our Site, access times and dates, and other statistics. We use this information to monitor and analyze use of the Site in order to constantly improve the functionality and usability of the Site. We also use this information to verify that visitors to the Site meet the criteria required to process their requests. We do not treat Log Data as Personal Information or use it in association with other Personal Information.

CALIFORNIA PRIVACY RIGHTS

Notice for California Users Under California Civil Code Section 1789.3, California users are entitled to the following specific consumer rights notice: The Complaint Assistance Unit of the Division of Consumer Services of the California Department of Consumer Affairs may be contacted in writing at 1625 N. Market Blvd., Suite N 112, Sacramento, California 95834, or by telephone at (800) 952-5210

CalOPPA also requires websites to post a Privacy Policy. Personally Identifiable Information under CalOPPA corresponds to Personal Data as used in the Privacy Policy. You can learn more about CalOPPA here. As required by CalOPPA, we agree to the following:

- Users can visit our site anonymously.
- Once this Privacy Policy is created, we will add a link to it on our home page or as a minimum, on the first significant page after entering our website.
- Our Privacy Policy link includes the word 'Privacy' and can be easily be found in the footer of each website page.
- We notify you of any Privacy Policy changes on this Privacy Policy Page
- You can change your personal information by emailing or calling us or logging into your account.

COMPLIANCE WITH LAWS AND LAW ENFORCEMENT

Transfr cooperates with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you, including Personal Information to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect the property and rights of Transfr, the property and rights any party involved with a transaction through the Transfr Site or Service, the property and rights any relevant third party, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, any illegal, unethical or legally actionable activity.

UPDATING YOUR INFORMATION OR OPT-OUT OF EMAILS

If you wish to opt-out of marketing and promotional emails, please contact us by email at hello@transfr.co or by phone at (800) 985-3188. You may not opt-out of receiving service-related emails. If you would like to update your contact information, please contact us by phone.