



POGO CARSHARE PRIVACY POLICY

This privacy policy describes the personal information we collect from you and how we use that information. This privacy policy covers both our collection and use of information when you use www.pogocarshare.com, as well as the kinds of information we collect when you join Pogo CarShare and use our services. This privacy policy does not apply to other Internet sites even if accessed via our websites. If you have any questions or concerns regarding our privacy policy, please contact us in one of the ways provided below.

Definition

Personal information means information that identifies you as an individual, or that we can combine with readily available information to identify you as an individual. This Privacy Policy does not apply to data from which personal identifying information has been removed. We retain the right to use such data in any way we deem necessary to advance our business interests.

Consent

When you provide us with your personal information, you consent and agree to our use and disclosure of your personal information in accordance with this Privacy Policy. The personal information that we collect about you will be with your consent, by your application for membership. To the extent permitted by law, your consent may be implied or express. We may collect personal information directly from you by phone, fax, social media, or e-mail, through your use of our website, or through your use of our vehicles. You may choose not to provide some or all of your personal information to us, but this may prevent us from providing our services to you or limit our ability to provide you with the level of service that you would otherwise expect from us as a Member.

What Information Does Pogo CarShare Collect?

The principle purposes for which we collect and store your personal and financial information are to process your application, allow you to reserve and use our vehicles, authorize payment, bill you, respond to your inquiries, improve our products and services and maintain your account with us.

When you visit the Pogo CarShare website, our servers automatically log certain information about your use of our websites, such as your IP address, your browser type, operating system, browser language and service provider. We also collect information about your activities on our websites, such as the pages you visit or the ads or links you click on. The first time you visit the Pogo CarShare website, Pogo CarShare assigns you a unique number, which is stored in one or more cookies on your computer's hard drive. These cookies help us distinguish new visitors from returning visitors and enable us to measure the effectiveness of content on the website and refine and tailor that content to suit our visitors' interests. If you have joined Pogo CarShare or provided other personal information about yourself (for example, if you send us an email), your cookie ID can be associated with you personally.

Pogo CarShare collects information that you voluntarily submit to us, such as your name, email address, postal address or telephone number, if you include that information in an email, or text message sent to us or that you tell us over

the telephone, in an instant message or by other means. Your telephone calls and email correspondence with us may be recorded or for quality control, training and similar purposes. By using these communication methods you are consenting to the recording or monitoring of your calls and emails with Pogo CarShare.

If you apply to join Pogo CarShare, we collect personal and financial information as you proceed through the stages of our online application, membership agreement and reservation process. In addition to your name and contact information, we will also collect your driver's license number and the jurisdiction in which you are registered and credit card or other payment information. We may also collect information such as your driving record from regulatory bodies where you live, and from third parties. This information is used to process your application and, if you are approved, for the purposes described below.

If you join Pogo CarShare and use our services, we collect information about your reservations (dates, times, locations, etc.) and your use of the Pogo CarShare service (trip time, mileage, accidents, etc.). We use this information to bill you, respond to your inquiries, provide and improve our products and services and maintain your account with us, to personalize your Pogo CarShare experience (i.e., by understanding your preferences), and to provide content and offers that we think may be of interest to you.

From time to time we will send newsletter emails. To unsubscribe from our newsletters please use the opt out in the account settings page. Pogo CarShares may be equipped with Global Positioning System (GPS) vehicle tracking technology. GPS is a network of satellites that allows us to determine the location (latitude and longitude) of Pogo CarShares vehicles. This information is transmitted to Pogo CarShare and stored (including while it is hired to you). Pogo CarShare uses this information for a variety of important purposes. For example, we use GPS data to help you find a car you have reserved, to provide roadside assistance when you need it, to ensure that a car is available at the place and time you have reserved, to locate lost or stolen Pogo CarShare vehicles.



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Children's Privacy

We do not knowingly solicit or collect individually identifying information from children under 18 years of age.

Where We Hold Personal Information

Pogo CarShare maintains servers within Canada, the European Union and in the United States of America. By joining Pogo CarShare and using our services, you consent to the transfer of your personal and financial information outside of Canada, as applicable, for the purposes described in this privacy policy.

To What Third Parties Might We Transfer Personal Information?

Except as described in this privacy policy, Pogo CarShare will not share your personal information with third parties outside the Pogo CarShare group unless it is necessary to provide the Pogo CarShare service, fulfill a transaction you have requested, or in other circumstances with your consent. We do however disclose your personal information within the Pogo CarShare group and to contractors, advisors, consultants and service providers acting on our behalf or under our instructions, including for purposes relating to the operation, maintenance, administration, improvement, and oversight of our services, websites and advertising services, or to fulfill your requests for information or service. If you apply for a Pogo CarShare membership, some of the information you supply must necessarily be shared with regulatory bodies where you live and/or service providers we utilize to obtain your driving record from such regulatory bodies. We do not share your personal information with such regulatory bodies or service providers beyond what is necessary to approve your application. By initiating the application process or applying to use Pogo CarShare services, you consent to the sharing of your personal information that Pogo CarShare deems necessary.

Without limiting the foregoing, we may disclose your personal information to:

- your company or organization if you use our services under a corporate account;
- your credit card issuers;
- credit reporting and fraud checking agencies;
- debt collection agencies, if you fail to pay monies owed to us;
- government or private organizations responsible for the processing or handling of traffic or parking related violations;
- driver licensing authorities, directly or through intermediary organizations, when needed to verify compliance with Pogo CarShare's safe driver criteria and/or to verify license personal information;
- government, regulatory and law enforcement agencies where the disclosure is required, authorized or permitted by law; and
- insurance companies

We may disclose your personal information in connection with a corporate transaction, proceeding, or reorganization involving the business activities for which the information is maintained. In the event that ownership of Pogo CarShare or its business was to change as a result of a merger, acquisition or transfer to another company, your personal information may be transferred.

If such a transfer results in a material change in the way your personal information is used, we will provide notice about the choices you have to decline to permit such a transfer.

Pogo CarShare may disclose your personal information, including location/GPS data, in response to legal process (for example, a court order, search warrant or subpoena) or requests from law enforcement authorities; in other circumstances in which Pogo CarShare believes the website, the Pogo CarShare service or our vehicles are being or has been used in violation of the applicable law or otherwise in the commission of a crime; when we have a good faith belief that there is an emergency that poses a threat to the safety of you or another person; or when necessary to protect the rights or property of Pogo CarShare or third parties.

Advertising and Personalized Content

Pogo CarShare may use personal information to present offers to you on our behalf and on behalf of business partners, but we do not share information that personally identifies you with those parties. If you do not want us to send you promotional emails, please adjust your settings within your account at www.pogocarshare.com.

Pogo CarShare may also use third party ad network providers and other service providers to help present customized content and offers on our websites. These providers use cookies, web beacons, or similar technologies on your computer to help present, better target, and measure the effectiveness of their content and advertisements, using data gathered over time and across their networks of web pages to determine or predict the characteristics and preferences of their audience. We may share certain non-personal information about you (such as age and postal code) with certain ad network and service providers to help them deliver more relevant content and advertisements through their networks. The use of cookies, web beacons, or similar technologies by content and ad network providers is subject to their own privacy policies, not ours.

Cookies are text files that are placed in your computer's browser, and that can be used to help recognize you on the Pogo CarShare websites. We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. We use session cookies to maintain session state and user identity. A persistent cookie remains on your hard drive for an extended period of time. We use persistent cookies to help remember user preferences. You can remove persistent cookies by following directions provided in your Internet browser's "help" file. You can control browser cookies through your browser's settings. You can control Flash cookies via the Macromedia Flash application on your computer, or by going to the Macromedia Flash Player website, which allows you to view, modify, and delete Flash cookies. You may delete cookies or set your browser to alert you when cookies are being sent. If you reject all browser or flash cookies, however, some areas of our sites may not function. The following third party advertiser/service provider may



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use cookies, web beacons, or similar technologies in connection with offers, content, and services offered through the Pogo CarShare website, including to help operate ad networks.

The use of cookies by our partners, affiliates, tracking utility company, and service providers is not covered by our privacy policy. We do not have access or control over these cookies. Our partners, affiliates, tracking utility company, and service providers use session ID cookies to make it easier for you to navigate our site.

Our website includes social media features, such as the Facebook Like button and widgets, such as the Share This button or interactive mini-programs that run on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our site. Your interactions with these features are governed by the privacy policy of the company providing it.

Our site includes links to other websites whose privacy practices may differ from those of Pogo CarShare. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

How May I Review and Correct My Personal Information?

Pogo CarShare is committed to providing you with reasonable and practical access to your information to allow you the opportunity to identify inaccuracies. If you are a member of Pogo CarShare, you can review and correct personal information by clicking on the “my account” button after you login in. If you would like to access, delete and/or correct other personal information held by Pogo CarShare, please contact us in one of the ways provided below and we will respond to your request within 30 days. When commercially practicable, if Pogo CarShare is informed of the inaccuracy we will make the appropriate corrections.

We will retain your information for as long as your account is active or as needed to provide you services. Please contact us if you wish to cancel your account or request that we no longer use your information to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

We may also retain and use your information in order to make promotional offers to you, unless you have opted out of receiving such communications.

What Security Measures Are Used to Protect My Personal Information?

Pogo CarShare has established safeguards, such as SSL encryption, to help prevent unauthorized access to or misuse of your personal information, but cannot guarantee that your personal information will never be disclosed in a manner inconsistent with this privacy policy (for example, as a result of

unauthorized acts by third parties that violate applicable law or the policies of Pogo CarShare and its affiliated providers). We use a password to help verify your identity before granting access or making corrections to any of your personal information. It is your responsibility to safeguard your password, which you should never disclose to a third party. If you contact us by phone, we will ask you to verify certain information related to your account before providing any access to personal information.

How Might This Privacy Policy Be Changed?

We may change this privacy policy from time to time, so it is advisable to review it frequently.

Changes to this privacy policy will be announced on our website or through similar means and all amended terms shall automatically be automatically effective no less than seven (7) days after announcement.

If you have questions about our handling of personal information, you may write to us at admin@pogocarshare.com.