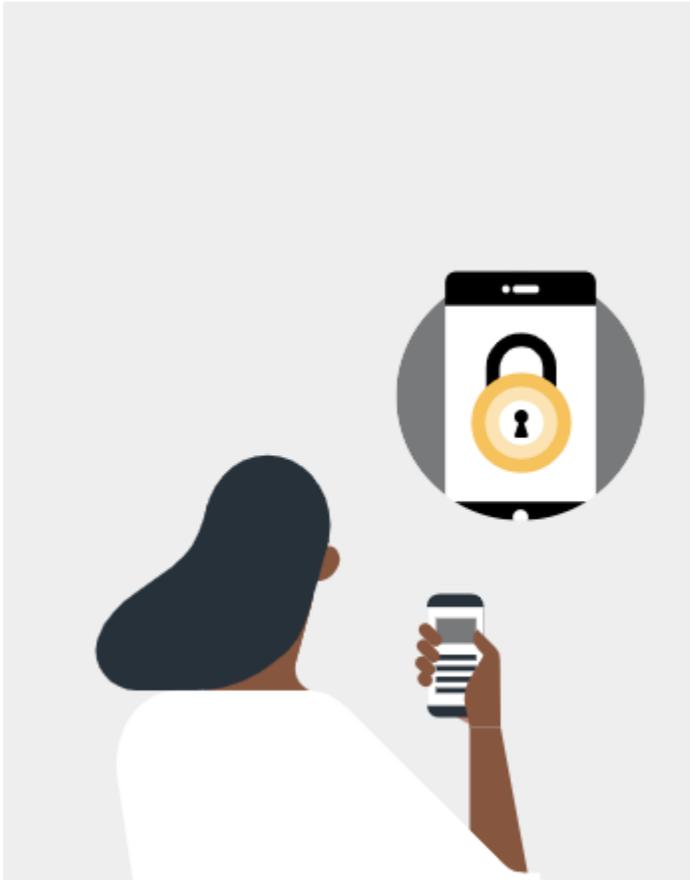Last modified: 1/27/2021

Loadbugs Privacy Notice

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I. Introduction

When you use Loadbugs, you trust us with your personal data. We're committed to keeping that trust. That starts with helping you understand our privacy practices.

This notice describes the personal data we collect, how it's used and shared, and your choices regarding this data. We recommend that you read this along with our privacy overview, which highlights key points about our privacy practices.

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II. Overview

A. Scope

This notice applies to users of Loadbugs's services, including users of Loadbugs's apps, websites, features, or other services.

This notice describes how Loadbugs and its affiliates collect and use personal data. This notice applies to all users of our apps, websites, features, or other services, This notice specifically applies to:

- Users: individuals who request or receive last mile services.
- Drivers: individuals who provide transportation to Users individually
- Delivery recipients: individuals who request or receive shipments, or other products and services
- Delivery persons: individuals who provide delivery or other services

This notice also governs Loadbugs's other collections of personal data in connection with Loadbugs's services. For example, we may collect the contact information of individuals who use accounts owned by Loadbugs for Business customers. We may also collect the personal data of those who start but do not complete applications to be drivers or delivery persons, those who rent bicycles, scooters, or other light electrical devices offered by other companies through a Loadbugs app, or in connection with our mapping technology and features.

III. Data collections and uses

A. The data we collect

Loadbugs collects:

- *Data provided by users to Loadbugs, such as during account creation*
- *Data created during use of our services, such as location, app usage, and device data*
- *Data from other sources, such as Loadbugs merchants and third parties that use Loadbugs APIs*

The following data is collected by or on behalf of Loadbugs:

1- Data provided by users. This includes:

- User profile: We collect data when users create or update their Loadbugs accounts. This may include their name, email, phone number, login name and password, address, profile picture, payment or banking information (including related payment verification information), driver's license and other government identification documents (which may indicate document numbers as well as birth date, gender, and photo). This also includes vehicle or insurance information of drivers and delivery persons, emergency contact information, user settings, and evidence of health or fitness to provide services using Loadbugs apps.
  This also includes gender and/or occupation (when required for certain Loadbugs services or programs, such as Loadbugs Cash or Women User Preferred).
  We may use the photos submitted by users to verify their identities, such as through facial recognition technologies. For more information, please see the section titled "How we use personal data."
- Background check and identity verification: We collect background check and identity verification information for drivers and delivery persons. This may include information such as driver history or criminal record (where permitted by law), and right to work. This information may be collected by an authorized vendor on Loadbugs's behalf.
- Demographic data: We may collect demographic data about users, including through user surveys.
- User content: We collect the information users submit when they contact Loadbugs customer support, provide ratings or compliments for other users or merchants, or otherwise contact Loadbugs. This may include feedback, photographs or other recordings collected by users.

B. How we use personal data

Loadbugs collects and uses data to enable reliable and convenient transportation, delivery, and other products and services. We also use the data we collect:

- *To enhance the safety and security of our users and services*
- *For customer support*
- *For research and development*
- *To enable communications between users*
- *To send marketing and non-marketing communications to users*
- *In connection with legal proceedings*

Loadbugs does not sell or share user personal data with third parties for their direct marketing, except with users' consent.

Loadbugs uses the data it collects for purposes including:

1- Providing services and features. Loadbugs uses the data we collect to provide, personalize, maintain, and improve our products and services.

This includes using the data to:

- Create and update users' accounts.
- Verify drivers' and delivery persons' identity, background history, and eligibility to work.
- Enable transportation, deliveries, and other services.
- Offer, process, or facilitate payments for our services.
- Offer, obtain, provide, or facilitate insurance, vehicle, invoicing, or financing solutions in connection with our services.
- Track and share the progress of rides or deliveries.
- Enable features that allow users to share information with other people, such as when Users submit a compliment about a driver, when delivery recipients provide feedback for a merchant or delivery person, refer a friend to Loadbugs, split fares, or share ETA and location with their contacts.
- Enable features to personalize users' Loadbugs accounts, such as creating bookmarks for favorite places, and to enable quick access to previous destinations.
- Perform internal operations necessary to provide our services, including to troubleshoot software bugs and operational problems; to conduct data analysis, testing, and research; and to monitor and analyze usage and activity trends.

2- Safety and security. We use personal data to help maintain the safety, security, and integrity of our services and users. This includes:

C. Cookies and third-party technologies

Loadbugs and its merchants use cookies and other identification technologies on our apps, websites, emails, and online ads for purposes described in this notice.

Cookies are small text files that are stored on browsers or devices by websites, apps, online media, and advertisements. Loadbugs uses cookies and similar technologies for purposes such as:

- Authenticating users
- Remembering user preferences and settings
- Determining the popularity of content
- Delivering and measuring the effectiveness of advertising campaigns
- Analyzing site traffic and trends, and generally understanding the online behaviors and interests of people who interact with our services

We may also allow others to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet, and to track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs, and other technologies to identify the devices used by visitors to our websites, as well as when they visit other online sites and services.

Please see our Cookie Notice for more information regarding the use of cookies and other technologies described in this section.

D. Data sharing and disclosure

Some of Loadbugs's products, services, and features require that we share data with other users or at a user's request. We may also share data with our affiliates, subsidiaries, and merchants, for legal reasons or in connection with claims or disputes.

Loadbugs may share the data we collect:

1- With other users

This includes sharing:

- Users' first name, rating, and pickup and/or dropoff locations with drivers.
- Users' first name with other Users in a carpool trip. Users in carpool trips may also see the dropoff location of the other Users.
- Delivery recipients' first name, delivery address, and order information with their delivery person and merchant. We may also share ratings and feedback, or other information to the extent required by law, with the merchant and delivery person.
- For drivers and delivery persons, we may share data with the User(s), delivery recipient(s) and merchant(s), including name and photo; vehicle make, model, color, license plate, and vehicle photo; location (before and during trip); average rating provided by users; total number of trips; length of use of the Loadbugs app; contact information (depending upon applicable laws); and driver or delivery person profile, including compliments and other feedback submitted by past users.

    We also provide Users and delivery recipients with receipts containing information such as a breakdown of amounts charged, driver or delivery person first name, photo, route map, and such other information required on invoices in the country or region where the driver or delivery person operates.
- For those who participate in Loadbugs's referral program, we share certain personal data of referred users, such as trip count, with the user who referred them, to the extent relevant to determining the referral bonus.

2- At the user's request

E. Grounds for processing

We only collect and use personal data where we have lawful grounds to do so. These include processing user personal data to provide requested services and features, for purposes of Loadbugs's legitimate interests or those of other parties, to fulfill our legal obligations, or based on consent.

We collect and use personal data only where we have one or more lawful grounds for doing so. Such grounds may vary depending on where our users are located, but generally include processing personal data:

A- To provide requested services and features

In order to provide our services, we must collect and use certain personal data. This includes:

- User profile data, which we use to establish and maintain user accounts; verify user identity; communicate with users about their trips, orders, and accounts; and enable users to make payments or receive earnings
- Background trip information, which is used to verify an applicant's eligibility to be a driver or delivery person
- Driver and delivery person location data, which we use to track trips and assist with navigation
- Usage data, which is necessary to maintain, optimize, and enhance Loadbugs's services, including to determine incentives, connect Users and drivers, and calculate costs of trips and driver earnings
- Transaction information
- Information relating to customer support

B- For purposes of the legitimate interests of Loadbugs or other parties

This includes using personal data to maintain and enhance our users' safety and security. For example, we use personal data to prevent use of our services by users who have engaged in inappropriate or dangerous behavior, such as by retaining data of banned users to prevent their use of Loadbugs's apps. We also use usage data to prevent matching of Users and drivers for whom

IV. Choice and transparency

Loadbugs enables users to access and control the data that Loadbugs collects, including through:

- *In-app settings*
- *Device permissions*
- *In-app ratings pages*
- *Marketing opt-outs*

Loadbugs also enables users to request access to or copies of their data, changes or updates to their accounts, deletion of their accounts, or that Loadbugs restrict its processing of user personal data.

A- Privacy settings

Settings menus in the Loadbugs app for Users give them the ability to set or update their location-sharing preferences and their preferences for receiving mobile notifications from Loadbugs. Information about these settings, how to set or change these settings, and the effect of turning off these settings is described below.

- Location data

Loadbugs uses Users' device location services to make it easier to get a ride whenever they need one. Location data helps improve our services, including pickups, navigation, and customer support.

Users may enable or disable Loadbugs to collect location data from their mobile devices through the Settings > Privacy menus in the Loadbugs app. Users and delivery recipients can enable or disable such collections through the settings on their mobile device.

- Share Live Location (Users)

Users who have enabled Loadbugs to collect location data from their mobile device may also enable Loadbugs to share their location with their driver from the time the ride is requested to the start of the trip. This can help improve pickups for both drivers and Users, particularly in crowded areas.

- Emergency Data Sharing (Users)

V. Updates to this notice

We may occasionally update this notice. Use of our services after an update constitutes consent to the updated notice to the extent permitted by law.

We may occasionally update this notice. If we make significant changes, we will notify users in advance of the changes through the Loadbugs apps or through other means, such as email. We encourage users to periodically review this notice for the latest information on our privacy practices.