



**WeTechnology S.r.l.**

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## **Privacy Policy for the processing of personal Wetaxi User data in accordance with Article 13 of Regulation (EU) 2016/679 (Regulation)**

**Version: October 2023 (previously published version: July 2022)**

This Privacy Policy is provided in accordance with Article 13 of Regulation (EU) 2016/679 (“GDPR”) and is related to the method of processing personal data provided by the data subject and performed by WeTechnology S.r.l., the data controller (hereinafter referred to as “Wetaxi” or “Data Controller”), for the management of the booking, payment, and organization of the taxi rides or other transport services (hereinafter, “the Service”) through the website [www.wetaxi.it](http://www.wetaxi.it) as well as the application used by taxi customers on Android and iOS systems, named Wetaxi (hereinafter, jointly referred to as “the Platform”).

This Privacy Policy describes the Platform management system concerning the Users accessing the same. Every third-party website to which the User may be redirected via the Website or the App is thus excluded from the policy.

### **What do we need your data for?**

We need your data to provide the Service and improve it; prevent any inconvenience throughout the taxi ride or other transport services and protect our users from eventual fraud or issues of any kind.

### **How do we use your data?**

We shall use and communicate the data you have provided to us through the Platform upon registration (i.e. name, surname, phone number) or the data we collect when you use the Service (your location, address of departure and arrival, and eventual special requests) to the Taxi Drivers’ Organizations, Taxi Drivers and the Transport Operators (in accordance with the General Terms and Conditions for the use of Wetaxi) that will perform the Service, or to the User with whom you will share the taxi ride.



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For the use of certain mobility services, it may be necessary to provide additional information (including, for example: a driver's license or ID card, a photograph, residential address, and tax code).

## **What are your rights over your data?**

You may request access, modification, transfer, or cancellation of your data to Wetaxi at any time. For further information, please consult the Rights of the Data Subject section of this Privacy Policy.

### **1 - Data Controller and Data Protection Officer**

The Data Controller of the personal data is WeTechnology S.r.l. – represented by its legal representative P.T. – with its headquarters at 2 Via Agostino da Montefeltro, Turin (e-mail: [privacy@wetaxi.it](mailto:privacy@wetaxi.it)).

The Data Protection Officer may be contacted through the following e-mail address: [dpo@wetaxi.it](mailto:dpo@wetaxi.it)

### **2 – Purposes and method of processing**

The data transmitted shall be stored and processed with the safety and confidentiality guarantees in accordance with the law, and shall be used to perform the Service requested by the User, for Wetaxi to send information related to such performance, and for legal purposes, as well as – upon prior consent of the Data Subject – for direct marketing and profiling purposes.

Data processing may occur through manual, digital, and automatic tools. Wetaxi hereby commits to take all the necessary preventive measures related to the type of personal data of the Users and the risks deriving from their processing, in order to protect their safety and, more specifically, to prevent that the data are altered or damaged, or are accessed by third parties.

The Passenger data we may collect and process at the different stages of Service use are outlined hereinafter.

## 2.1 Data collection method

Throughout the registration process, we shall collect certain compulsory data for the use of the Service through our Platform. Moreover, when using our Platform, we may collect additional data to allow the User to access advanced functions or to improve our Service. The data we may collect include:

- data provided by the Users in the registration phase in order to use the Service, including their name, surname, mobile phone number (compulsory data), as well as their e-mail and a digital photograph (optional data), or the name, surname, and mobile phone number of a third party, should the Users book a Service provided by Wetaxi on behalf of the third party. Wetaxi will not be able to provide the Service should the requested data not be provided, and consequently the User will not be able to create an account;
- additional information provided by the User when requesting certain transportation services integrated into the Platform (including, for example: a driver's license or ID card, a photograph, residential address, and tax code);
- corporate billing data;
- data necessary to access the Service, namely the origin and destination, the selected payment method, the date and time of the trip;
- data sent throughout use of the Service, namely the GPS coordinates of the User's device;
- additional options related to the request, including – by way of example: luggage, low or high-step vehicle, presence of pets, need for wheelchair transportation, visually impaired passenger;
- data necessary for payment through the app by means of the electronic payment methods available;
- data collected automatically and related to use of the Service, i.e. rides completed, predicted rate, and rate paid for each request.

Hereinafter, we shall use the term “Personal Data” to define all the previously described data and any other data we may collect. Moreover, we hereby remind you that the IT/electronic systems and software mechanisms designed for the appropriate functioning of the Platform acquire – throughout regular operation – general data whose transmission is implicit to the use of web communication protocols to improve website management and optimization (i.e. IP addresses, URL addresses, domain names, cookies, time of requests, file sizes, and other parameters related to the User's operating system).

## 2.2 Purposes of Data Processing

The Personal Data collected are used for all the purposes listed hereinafter.

### 2.2.1 Performance of Wetaxi Services

We use the User's Personal Data to satisfy the obligations of the agreement existing between Wetaxi and the User, in accordance with Article 6.1.(b) of the GDPR. In particular:

- to allow Users to customize their profile on the Platform and access advanced services such as corporate billing data, as well as satisfying specific transportation requirements; the Personal Data provided may be changed at any time by means of the "Profile" area of the Wetaxi app menu;
- to allow the request, booking, and sharing of a taxi ride;
- to facilitate the identification and selection of the Taxi Driver and User. For this reason, Wetaxi provides certain User data to the Taxi Driver and vice versa, and has access to the User location data through its geolocation systems in the time between confirmation of the ride and the User's entrance into the vehicle;
- to facilitate identification of a passenger or beneficiary of the Wetaxi Service other than the User, should the latter book a Wetaxi Service for a third party;
- to facilitate the identification and selection of the Users who have requested a Group Ride;
- enable the use of other transportation and mobility services including: the train service, parking payment, public transportation service, and other mobility services integrated into the Platform;
- to manage User payments by means of preset and selectable electronic payment methods available on the Platform;
- to manage a history of all trips completed by the Users;
- to issue payment receipts corresponding to the trips completed through the Platform;
- to offer the best possible assistance to the Users at any time;
- to cater for any other need related to provision of the Service.

Provision of your data for such purposes is necessary to benefit of the Service supplied. Should the User intend to book the Service provided by Wetaxi for a third party, the User hereby guarantees, as of now – with all the related liability – that

such particular processing eventuality is founded on a suitable legal framework, which legitimizes the communication of the related data to Wetaxi.

Normally, the Data Controller shall not process Special Categories of Personal Data of the Data Subject (the GDPR defines such categories as: *“personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and [...] genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation*); should it be necessary – for example, in case of disabled passengers – the Data Subject will be asked a pre-emptive consent to such processing, in accordance with Article 9.2.(a) of the GDPR.

Moreover, the Personal Data of the Users may be processed for statistical research/analysis purposes related to aggregate or anonymous data, thus without the ability to identify the Data Subject and without the need for the latter to provide his prior consent.

### **2.2.2 Customer care and communication**

It is specified that customer care and communication related to customized offers, own and third-party partner services by means of automated tools (SMS, e-mail, push notifications) are restricted to registered Users, in accordance with the General Terms and Conditions for the use of Wetaxi, and are indeed a service provided by Wetaxi, as well as its contractual obligation towards registered Users, with the communications explicitly requested by the Users and that are consequently not forms of direct marketing.

The legal framework of personal data processing for the purposes specified in this section are items (b) and (c) of Article 6, paragraph 1 of the GDPR, in that the processing is necessary for the provision of the services or for the response to requests made by the Data Subject, compliant to the General Terms and Conditions for the use of Wetaxi approved by the User; it also represents a necessary processing to comply with a legal obligation borne by Wetaxi.

The provision of personal data for such purposes is compulsory, but the eventual failure to provide such data would render the activation of the Platform Services impossible.



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The User may decide to not receive such communications at any time by writing to [privacy@wetaxi.it](mailto:privacy@wetaxi.it).

### **2.2.3 Fraud prevention and exercise of defense**

Numerous digital services may suffer financial damage caused by fraud through the insertion of falsified electronic payment method data. Just like many other digital service companies, Wetaxi is exposed to such risk and uses certain Personal Data of its Users in order to prevent eventual fraud or to ascertain, exercise, or defend its rights before a court, on the basis of its own legitimate interests, in accordance with Article 6.1.(f) and Article 9.2.(f) of the GDPR.

## **3 – Data storage**

Your Personal Data shall be stored for the time necessary to perform the services specified in the agreement, in accordance with the principle of data minimization outlined in Article 5.1.(c) of the GDPR, notwithstanding, in any case, the additional storage time specified in the applicable legislation, including Article 2946 of the Italian Civil Code. Additional information is available upon request to the Data Controller.

Users may, at any time, delete their account and the related data by means of the “Delete Account” button in the “Other Options” section of “Profile” menu of the Wetaxi app, or by writing to [privacy@wetaxi.it](mailto:privacy@wetaxi.it).

In such case, Wetaxi hereby commits to not use the data for purposes other than legal obligations. Certain Personal Data will not be eliminated directly, but will be duly blocked and protected throughout the time during which liability issues related to their processing may arise, or throughout the time requested by any regulation in force. During such time, your personal data shall not be processed for purposes other than the involvement in liability or the fulfilment of such legal obligations.

Consequently, only Wetaxi employees with duties specifically related to such purposes may access the data in order to satisfy such duties or eventual legal obligations. Once the time for such potential actions has expired and the said legal obligations have ceased to exist, Wetaxi will definitively delete the Personal Data without further ado.

#### **4 – Recipients of the Personal Data and transfer of data abroad**

Personal Data of the Users may be accessed by the employees (in the capacity as processors in accordance with Article 29 of the GDPR), by suppliers of certain online services to Wetaxi, and by other Users (only in case of sharing of the taxi ride with the Data Subject), but in any case strictly for the purposes of guaranteeing a suitable and safe functioning of the Service offered, and for the time strictly necessary for the related fulfilments.

Some of the User data may be supplied to the Taxi Driver performing the taxi ride, or to the Taxi Drivers' Organization and members and/or employees of the latter, to the Transport Operators, in accordance with the General Terms and Conditions for the use of Wetaxi, who shall act as independent data processors, strictly for the purposes of managing all Wetaxi functions and guarantee the utmost precision of the Service offered.

Some of the data may be communicated to individuals, bodies, or authorities to which your Personal Data must be compulsorily communicated to in accordance with legal provisions or authority orders.

Moreover, for some of the activities listed in paragraph 2, and in order to provide its Service to the Users, Wetaxi avails itself of select external partners and suppliers, designed as data processors in accordance with Article 28 of the GDPR. The updated and complete list of data processors may be requested to the Data Controller through the specified contact details.

As for the eventual transfer of data abroad, the Data Controller hereby specifies that processing shall occur in accordance with one of the methods permitted by the legislation in force. In particular, the transfers will be based on a decision of adequacy by the European Commission or on the Standard Contractual Clauses approved by the European Commission. Additional information may be requested to the Data Controller through the specified contact details.



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## 5 – Rights of the Data Subject

You have the right to be granted access to the Personal Data concerning yourself, in accordance with articles 15-22 of the GDPR. In particular, you may request: the rectification or cancellation; the limitation of processing of the Personal Data in cases specified in Article 18 of the GDPR; and data portability of the Personal Data concerning yourself in cases specified in Article 20 of the GDPR. Moreover, you have the right to lodge a complaint with the Supervisory Authority (Data Protection Authority), in accordance with Article 77 of the GDPR.

You may file a request to object the processing of your Personal Data in accordance with Article 21 of the GDPR, in which you shall give proof of the reasons justifying the objection: the Data Controller reserves the right to assess your request, which shall not be accepted in case legitimate, binding reasons to process the data that may violate your own interests, rights, and freedom should exist. Furthermore, we hereby inform you that you have the right to oppose – at any time and without justification – the receipt of direct marketing through automated tools (SMS, e-mail, push notifications, fax, automatic call systems, social networks, WhatsApp) and non-automated tools (mail, assisted calls), and to oppose profiling. You may exercise the right to oppose direct marketing even partially, by opposing – by way of example – marketing through automated tools only.

All requests shall be sent to the Data Controller by writing to [privacy@wetaxi.it](mailto:privacy@wetaxi.it), or to the Data Protection Officer (“DPO”) by writing to [dpo@wetaxi.it](mailto:dpo@wetaxi.it).