

PRIVACY AND DATA PROTECTION POLICY

Ver. 1/2023.12.20

Dear User, we invite you to find below the Policy regarding the processing of personal data on the website www.movcar.app and in the Mobile Application: „Movcar”.

The data controller: In the course of its activity, LIMITLESS SOLUTIONS SRL, in its capacity as Controller, with headquarters in Bucharest, Romania, postal code 010033, 25 Ion Câmpineanu Street, Building 9, Entrance A, Floor 15, apartment 87, Room 1, Modul M15, registered with the Trade Register under no. J40/4423/2019, CUI 40902525, processes your personal data when you access the website www.movcar.app ("the Website"), and when you access the Application for the mobile phones "Movcar" ("The Application").

LIMITLESS SOLUTIONS SRL ensures, at all times, the observance of all the principles and legislation regarding the protection of personal data, regarding the processing, collection, processing, storage and transfer of personal data, as they are regulated by the legislation in force, Law 190/2018 on measures to implement Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, as well as and by the provisions of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as "GDPR" or "Reg. (EU) 2016/679").

This policy sets out the key principles regarding confidentiality measures, data protection and how LIMITLESS SOLUTIONS SRL processes the personal data you entrust to us by accessing the Website and the Mobile Application. Limitless Solutions SRL will ensure the updating of this policy and will publish on its website the latest version.

Personal data: according to art. 4 point 1 of Reg. EU 679/2016, means any information about an identified or identifiable natural person ("Target Person") that can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, identification number, data location, an online identifier, or to one or more elements specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person.

Processing of personal data: according to art. 4 point 2 of Reg. EU 679/2016, means any operation or set of operations performed on personal data or on personal data sets, with or without the use of automated means, such as collecting, recording, organizing, structuring, storing, adapting or modifying, extracting, consulting, use, disclosure by transmission, dissemination or making available in any other way, alignment or combination, restriction, deletion or destruction of data.

When you use our site or application, you provide us with your personal data. We make constant efforts and are committed to protecting the confidentiality and security of the importance of your personal data to them. We want to inform you through this privacy notice, about the processing conditions of your personal data as a data subject and user of our Website, as well as the Mobile Application, as well as about the nature, purpose and object of the processing of personal data that we also collect the rights you have.

LIMITLESS SOLUTIONS SRL constantly implements technical and organizational measures to ensure the complete protection of personal data processed both through the Internet and through the activity that it actually performs. However, the transmission of data over the Internet, in principle, may have security deficiencies, so absolute protection cannot be guaranteed.

The categories of personal data processed vary depending on the interaction with the functionalities of the application and the reports you record on the Mobile Application, for your own usage or for the service providers. We do not use personal data to use our website to present the application.

Source of processed data

The user: Your personal data may be provided by you within the various sections of the Mobile Application, in particular in the following situations: when you create an account in the "My Account" section, when you use a section of the Application or when you complete the contact form in the "Contact section".

Other sources: Your personal data may be obtained from external and public sources, such as the situation where the Application or the site verifies the IP of the device used.

What personal data do we collect?

We can collect and process the following personal data, depending on which features of the Application you use in interacting with us:

1. Identification and contact details of the natural person:

- Surname
- Name
- Mobile phone
- E-mail
- Signature
- Domicile / residence address
- National Identification Number, address, date and location of birth driving license category as well as any personal data from ID documents
- The image from the documents uploaded to the application.

2. Financial data:

- Annual tax, value of taxes paid through the Application, value of insurance.

3. Data about the assets owned:

- Details about the car: brand, model, production year, registration number insurance number, chassis series, year of manufacture.
- Details about real estate: type, structure, surface, compartmentalization, year of construction.

4. Data on the activities carried out:

- Data about travel, destination country, purpose, sports practiced.

5. Identification data of the device used

- Terminal IP address

User data. We have an obligation to collect accurate and up-to-date data. Therefore, as the User enters the data in the Application, the data provided by you as an Application user must be real, accurate and up-to-date. At the same time, for the correct provision of the services offered by the Application, we recommend you to update the incorrect data. The data mentioned in the above points are provided by you on a voluntary basis when using the Limitless Solutions SRL application, depending on the purpose transmitted by you. Without these data, we will not be able to provide you the services selected by you.

Third party data. Because in the interaction with us, you may also use data from third parties, when you use the Application, you must ensure that you have the right to provide it. You are therefore responsible for the data you provide on the Website and Application, both to us and to any third party that may be harmed by providing the data.

Internet browsing data. The Movcar App for mobile and tablet may also collect certain information and personal data about your navigation and interactions with the various sections of it. We will store or access information and cookies in your terminal equipment (computer, phone, tablet, etc.) only under the conditions described in the appropriate Cookies section. The categories of personal data that are processed include: the IP address of the terminal from which the website was accessed or the Mobile Application.

For what purposes do we process your personal data?

We process your personal data mentioned above for the following purposes and legal grounds:

- a) for providing the services according to the Terms and Conditions, pursuant to art. 6 para. 1 lit. of the GDPR; the different functionalities of the Application involve the provision of personal data from different categories, as classified above. In this context please consider that we will allow you to keep your personal ID (scan) or driving license (scan) or other documents at your choice in your online profile, which will be helpful in case you want to report a claim and attach them to the claim file that you want to send to any insurance company or to another third party; these documents will be kept at your choice and you can delete them any time, or send them to any third party.
- b) In the context of data processing, in order to ensure a good functioning of the applied Movcar App, the legal basis of the acquisition represents the legitimate interest of the Company to improve its services, according to art. 6 para. 1 lit. f of the GDPR.
- c) For the purpose of managing requests, complaints, suggestions specific to the functionalities of the application: the processing of these personal data is performed to provide the services specific to the application, of legal obligations of the Controller according to art. 6 para. 1 lit. c of the GDPR, as well as in the legitimate interest of Limitless

Solutions SRL in order to solve the complaints, improve the services, manage the suggestions and requests transmitted to Limitless Solutions SRL;

- d) Marketing: only on the basis of your consent, according to art. 6 para. 1 lit. of the GDPR, the transmission of newsletters to subscribers by means of communication such as e-mail, telephone; processing of this personal data – name, surname, email, phone number;
- e) We use your personal data to support you and improve your relationship, sharing relevant information with you. In this case, the processing of the personal data is carried out based on your consent.

Thus, your personal data can be used:

1. To manage our Application
2. Improving the services and content of our Application
3. Personalization of services and products
4. To promote our products and services or our partners, including the insurers
5. To fulfill the following functionalities of the Application:
 - a) The possibility to receive notifications regarding the expiration of the periodic technical inspection of ITP, of the RCA and / or CASCO type insurance, of the periodic technical reviews, of the damage, based on the previous configurations made by you in this regard; These may contain links or information regarding third parties, such as: ITP stations, insurance products, insurance brokers, etc., which you can use or not, at your choice.
 - b) The possibility to report damage to an insurance company, the system helping you to collect relevant information such as: personal data, relevant photos, signature, summarizing them in a damage report, which will be sent by you by email to your CASCO insurer, or to the insurer of the other party, if you were injured by another party; the insurance company will contact you directly by phone or email to request more details; the decision to send this report and its recipient belongs to you, the Application being only a platform that helps intermediation.
 - c) The possibility to order a towing service offered by an external supplier of such services
 - d) Possibility to pay different taxes by SMS, through an external service provider (Fetești bridge tax, parking fee, rovinietă)
6. To comply with the laws and regulations in force.

We will not use your personal data for other purposes, which are not provided for in this "Privacy Policy". We will contact you before using your personal data for new purposes, to inform you about changes to our personal data protection rules and to give you the option to accept or decline.

How do we collect your personal data?

We collect personal data when you send us a request, when you will create an account in the application, or when we use cookies, respectively:

- Account creation in Limitless Solutions SRL Application
- Subscribe to the newsletter

- Email or telephone requests
- Tenders
- Data for the conclusion of commercial contracts
- Data for issuing invoices to individuals
- Other general online forms
- Cookies

Do we share or sell your personal data to third parties?

We do not sell your personal data and do not share your personal data outside of LIMITLESS SOLUTIONS SRL, unless we have your express agreement for an express purpose (such as the provision of services by providers, through the Application), if we have an obligation under European law or national law or to LIMITLESS SOLUTIONS SRL providers, for to fulfill our obligations to you and only with those partners who share the LIMITLESS SOLUTIONS SRL commitment to protect your privacy and personal data.

We may transmit personal data to technical service providers necessary for the operation of the application, but only in specific and justified cases.

In case you draw up the damage report with the data and information collected by you, the damage report can be sent to your CASCO insurer, or to the insurer of the other party; the insurance company will contact you directly by phone or email to request more details. Limitless Solutions SRL ensures only the transmission of the report.

In the event that you order a towing service, your data and information will be sent to the external supplier, in order to come and pick up the car. Limitless Solutions SRL provides only the intermediation of the service request.

If you wish to take out insurance from those made available to you through the Application, the data will be sent to the Insurance Broker who will take care of concluding the insurance contract and issuing the insurance policy.

If you decide to pay various fees by SMS, the data will be transmitted to the external provider that provides this service.

The list of categories of partners can be found in Annex 1 to this Privacy Policy.

Where do we process your data?

The personal data processed by Limitless Solutions SRL will be processed in the European Union. They will not be transferred to countries outside the European Union.

However, if it is necessary to transfer personal data concerning you to a third country (ie outside the European Union and the European Economic Area), Limitless Solutions SRL will ensure that this transfer will take place to states for which a decision of the European Commission on the appropriate level of data protection has been issued. In the absence of such a decision, the Company will implement appropriate safeguards in accordance with the provisions of the Regulation.

How long do we keep your information?

LIMITLESS SOLUTIONS SRL processes personal data for the duration necessary to carry out the specific purposes respectively during the provision of services through the Application. The Company processes data also in its legitimate interest, insofar as this is granted by the European legislation or other laws applicable to the subscribed activity, and outside the

duration of the specific purpose or interest. we legitimately process the data given by you on the base of consent as long as you allow us, but not more than 5 years. If the purpose of the processing and storage is not applicable or if a storage period provided for by European law or other law expires, Limitless Solutions SRL ensures that personal data are blocked or deleted, in accordance with the legal requirements and the privacy policy. Regarding the relationship with the users of the site or the Application, LIMITLESS SOLUTIONS SRL, informs the data subjects about the purpose of the processing, obtains the consent of the data subjects when the processing is based on consent and responds to the justified requests for deletion of personal data, when appropriate.

If personal data are processed on the basis of your consent, we inform you that the withdrawal of prior consent will not affect the lawfulness of the processing performed by the Company on the basis of consent prior to withdrawal.

According to the GDPR, we will not delete your data if the processing is necessary to establish, exercise or defend our rights conferred by law, (for example, a legal obligation to process the data or the obligation to keep accounting records). However, if, following a request from you, we restrict the processing of your data, we will still be entitled to process such data in order to exercise or defend our rights under the law.

Profiling and automatic decision making

We would like to inform you that your data will be processed by automatic means, through the Application, but we will not perform profiling with them.

What rights do you have in connection with your personal data?

- **The right to be informed**

Each data subject has the right guaranteed by the European legislator to obtain from the operator a confirmation that his personal data are processed or not.

- **The right of access**

Each data subject has the right guaranteed by the European legislator to obtain from the operator free information on his personal data, stored at any time, together with a copy of this information. In addition, the European directives and regulations grant the data subjects access to the following information: the purpose of the processing; the categories of personal data concerned; the recipients or categories of recipients to whom the personal data have been or will be disclosed, especially to recipients from third countries or international organizations; if possible, the period for which the personal data will be stored or, if not possible, the criteria used to establish this period; the existence of the right to request the operator to rectify or delete personal data or to restrict the processing of personal data relating to the data subject or to oppose such processing; the existence of the right to lodge a complaint with a supervisory authority; if the personal data are not collected from the data subject, any available information regarding their source; the existence of an automatic decision-making process, including profiling, within the meaning of Article 22, paragraphs 1 and 4 of the General Data Protection Regulation, and, at least in these cases, significant information on logical reasoning applied, as well as the significance and consequences envisaged in the case of such processing towards the data subject. In addition, the data subject

will have the right to obtain information regarding the transfer of personal data to a third country or to an international organization. In this case, the data subject has the right to be informed about the appropriate transfer guarantees.

- **The right to rectification**

Each data subject has the right guaranteed by the European legislator to obtain from the operator, without undue delay, the rectification of his inaccurate personal data. Taking into account the purposes of the processing, the data subject has the right to complete incomplete personal data, including by providing an additional statement.

- **The right to delete**

Each data subject has the right guaranteed by the European legislator to obtain from the operator the deletion of personal data concerning him, without undue delay, and the operator has the obligation to delete, without delay, personal data if one of the the following reasons apply, as long as the processing is no longer necessary or legal: Personal data are no longer required in relation to the purposes for which they were collected or otherwise processed; The data subject withdraws consent to which processing is based in accordance with Article 6 (1) (a) of the General Data Protection Regulation or Article 9 (2) (a) of the General Protection Regulation Data and if there is no other legal basis for processing; The data subject opposes the processing in accordance with Article 21, paragraph 1 of the General Data Protection Regulation and there are no compelling legal reasons for the processing or the data subject opposes the processing according to Article 21 (2) of the General Protection Regulation data; Personal data were processed illegally; Personal data must be deleted in order to comply with a legal obligation of Union or Member State law to which the operator is subject; The personal data were collected in connection with the offer of the information society services referred to in Article 8 (1) of the GDPR. Where the operator has made public his personal data and is obliged, in accordance with Article 17 (1), to delete the personal data, he shall, taking into account the technology available to him and the costs of implementation, take reasonable measures, including technical measures, to inform all other operators that process the data, that the data subject requested the operator to delete any links, copies or replicas of this personal data, to the extent that the processing does not more is needed. The management of LIMITLESS SOLUTIONS SRL or another employee, with specific attributions, will establish the necessary measures for each individual case.

- **The right to data transfer**

Each data subject has the right guaranteed by the European legislator, to receive the personal data that has been provided to an operator, in an electronic format with an ordinary / intuitive structure. It has the right to transmit this data to another operator without hindering by the operator to whom the personal data were provided, as long as the processing is based on the consent provided for in Article 6 (1) (a) of the General Regulation on Data Protection or Article 9 (2) (a) of the General Data Protection Regulation or a contract pursuant to Article 6 (1) (b) of the General Data Protection Regulation, and the processing is done by means automatic, as long as the processing is not necessary to perform a task of public interest or in the exercise of the public authority conferred on the operator. In addition, in exercising his right to data portability, in accordance with Article 20 (1) of the GDPR, the data subject has the right to transmit personal data directly from one operator to another, if this is feasible from the point

of view technically and when this procedure does not adversely affect the rights and freedoms of others.

- **The right to object**

Each data subject has the right guaranteed by the European legislator to oppose, at any time, for reasons related to his particular situation, to the processing of personal data concerning him, on the basis of letter (e) or (f) of Article 6 (1). (1) of the Regulation. This also applies to profiling based on these provisions. LIMITLESS SOLUTIONS SRL will no longer process personal data in the event of an opposition, unless we can demonstrate well-founded reasons regarding the processing, deprivation of the interests, rights and freedoms of the data subject if necessary for the establishment, exercise or defending legitimate claims. If LIMITLESS SOLUTIONS SRL processes personal data for direct marketing purposes, the data subject has the right at any time to oppose the processing of his personal data for such marketing. This applies to profiling insofar as it is related to such direct marketing. If the data subject opposes LIMITLESS SOLUTIONS SRL regarding the processing for direct marketing purposes, LIMITLESS SOLUTIONS SRL will no longer process personal data for these purposes. Also, LIMITLESS SOLUTIONS SRL, at any time, offers you the option to change your wishes or unsubscribe from direct marketing using the links in the emails you receive.

- **The right to withdraw the data protection consent**

Each data subject has the right granted by the European legislator to withdraw his consent regarding the processing of his personal data at any time. At any time, you can contact LIMITLESS SOLUTIONS SRL with any questions or concerns you have regarding this privacy policy or send an email to office@movcar.app explaining your request.

The right not to be subjected to an automated individual decision-making process
As a responsible company, we do not use automatic decision making.

- **The right to address a complaint in court and ANSPDCP**

How can you contact us regarding your rights provided by GDPR or to request the deletion of your account and personal data?

If you wish to delete your account, you can do so at any time by using the dedicated button in the app, or by sending a message to our contact section on our site: <https://movcar.app> or to the e-mail address: dpo@movcar.app.

For the exercise of any of the rights listed above, for any request regarding data protection, questions or concerns regarding your rights, or a request to delete your personal data, you can contact us at:

- a. dpo@movcar.app
- b. in our contact section on our site at <https://movcar.app>
- c. you can send us a written request, dated and signed, at the following contact details:
Bucharest, Romania, postal code 010033, 25 Ion Câmpineanu Street, Building 9, Entrance A, Floor 15, apartament 87, Room 1, Modul M15.

Regardless of the way you contact us, we will respond as soon as possible, within the 30 days provided by law.

The legal basis for processing

Article 6, paragraph (1) lit. a) of the General Regulation on Data Protection serves as a legal basis for the processing operations to which we request consent for certain processing purposes.

If the processing of personal data is necessary for the conclusion and, subsequently, the execution of a contract to which the data subject is a party, as is the case, for example, when processing operations are necessary for the supply of goods or for the provision of any other service, processing is made on the basis of article 6, par. (1) lit. b) of the General Regulation on Data Protection. The same is true for the processing operations that are necessary for carrying out pre-contractual measures, for example in the case of inquiries regarding our products or services.

If our company is subject to a legal obligation that requires the processing of personal data, such as the fulfillment of tax obligations, the accounting archive and other archives, registers and opines required by law and by specific nomenclature, labor law, insurance and social protection etc., processing is done on the basis of art. 6, para. (1) lit. c) of the General Data Protection Regulation (GDPR).

In rare cases, processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a data subject, regardless of their relationship with them, was injured at our premises and their name, age, health insurance data or other vital information should be forwarded to a physician, hospital, or other third party. Then, the processing will be based on Art. 6, par. (1) lit. d) of the General Data Protection Regulation (GDPR).

Finally, the processing operations are based on Article 6 para. (1) lit.f) of the General Regulation on Data Protection. This legal basis is used for processing operations that are not covered by any of the legal reasons mentioned above, if processing is necessary for the purposes of the legitimate interests pursued by our company or a third party, unless these interests are removed by interests or the fundamental rights and freedoms of the data subject, which require increased protection of personal data. Such processing operations are especially permitted because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is the client of the operator (recital 47, sentence 2 of the GDPR), in which case, for example, the processing of personal data is aimed at direct marketing can be considered as held for a legitimate interest (recital 47, last sentence of the GDPR).

The provision of personal data as a legal or contractual requirement.

The requirement necessary to conclude a contract; Obligation of the data subject to provide personal data; the possible consequences in case of refusal to provide this data.

We clarify that the provision of personal data is required in part by law (eg tax regulations, accounting, labor law, archiving rules) or may also result from contractual provisions (for example, information about the contractual partner and / or his representative). Sometimes it may be necessary to conclude a contract according to which the data subject provides us with personal data, which must be further processed by us. The data subject is, for example, obliged to provide us with personal data when our company signs a contract with him or her. The refusal to provide the personal data would have the consequence that the contract could not be concluded with the data subject or the company he represents.

Legitimate interests pursued by the operator or a third party

If the processing of personal data is based on Article 6 (1) letter. f. from the General Data Protection Regulation, our legitimate interest is to conduct our business in favor of the welfare of all our employees and shareholders, as long as we develop products that are in your area of interest. Also, if there is or has been a commercial or information report, either you have applied for an offer, you have benefited from the goods and services offered by LIMITLESS SOLUTIONS SRL, or you have subscribed to our newsletter, information and data personal character may be used for the transmission to you of any communications from LIMITLESS SOLUTIONS SRL for the purpose of advertising, marketing and advertising, including commercial communications, such as newsletters, reports, news, offers, by any means, including by e-mail, telephone, sms, mms, courier, as long as you have given your consent for marketing purposes.

You may withdraw your consent to the use of personal data for marketing purposes at any time by sending a written request by email at dpo@movcar.app, to our contact address or you can send us a written request, dated and signed, at the contact details mentioned earlier.

Cookies and analytical data

Any information we collect automatically is related to your use of the website. This information is anonymous and collected through log files from our servers. These files record generic information, such as the number of visits our site receives, the types of browsers used, and the number and types of files downloaded, but never personal information. This information provided by log files allows us to create better content for your preferences. Some of our pages use a browser feature called "cookie". Cookies, in and of themselves, cannot extract personal information from you. Such a cookie automatically identifies your computer on our servers when you visit our site, but not yours. Unless you specifically tell us, LIMITLESS SOLUTIONS SRL will never know who you are, even if we could give your computer a cookie. Also, the website can only read the cookies created by the site. The Website uses third-party analytics cookies. Cookies, among other things, allow us to customize the site for you and provide you with information that corresponds to your needs and wishes. For example, once you choose a language and type of visitor, a cookie is written on your computer so you don't have to make that choice again in the future. When you download documents or files from our customer portal, a cookie is written on your computer so you can be informed about the updated versions of these files. Contact us for any questions.

LIMITLESS SOLUTIONS SRL is responsible for reviewing and approving the privacy policies, as well as for the fact that any breach of data security is handled properly.

LIMITLESS SOLUTIONS SRL has the following responsibilities:

1. Process personal data only for one or more specific, explicit and legal purposes;
2. Only processes personal data in ways that are compatible with the purposes for which it was initially collected, and in the event of a change of purpose, undertakes to verify in advance whether the purposes are compatible with the original ones;
3. Keep personal data in a safe place, implement appropriate technical and organizational measures, taking into account the current state of technology, implementation costs, processed data and associated risks;
4. Maintains accurate and up-to-date personal data, as far as possible;
5. Ensures that personal data are adequate, relevant and not excessive;
6. Do not keep personal data longer than necessary for the specific and determined purpose or purposes;
7. Provides a copy of the personal data to any holder, upon request and responds to any request related to the protection of personal data.

As technologies on the Internet change, LIMITLESS SOLUTIONS SRL reserves the right to change its privacy policy periodically. By using our application, website and services, you agree to the terms and conditions as well with this privacy policy.

We will establish technical and organizational measures to protect and ensure the confidentiality, integrity and accessibility of your personal data processed; we will prevent unauthorized use or access and will prevent the breach of the security of personal data, in accordance with the legislation in force.

Annex 1

Categories of partners which you can find in the application

- **Technical service providers necessary for the operation of the application**
- **Service providers for automotive, towing services, tax payment**
- **Insurance Brokers**
- **Insurance Companies**
- **Consultants**
- **Legal service providers**