

STAR LUX

PRIVACY POLICIES

Last Updated: September 01, 2022

This notice applies to users of Star Lux services anywhere in the world, including users of Star Lux apps, websites, features, or other services. This notice specifically applies to:

- **Riders**: individuals who request or receive transportation, including those who receive transportation requested by another individual
- **Drivers**: individuals who provide transportation to Riders individually or through partner transportation companies

In addition, please note the following:

For Guest Users: The personal data of those who order or receive trips, deliveries or order pick-ups via partner websites or apps (such as when ordering from a restaurant or other merchant), or arranged by other account owners (collectively “Guest Users”) is used solely to provide such trips, deliveries, or other services requested through a third party, and for purposes of safety and security, customer support, research and development, enabling communication between users, and in connection with legal proceedings and requirements.

Data controller and transfer

Star Lux operates, and processes personal data, globally. The exercise of data protection rights can be directed at any controller mentioned above, preferably via the designated channels, and will be handled by Star Lux as a group. We may also transfer such data to countries other than the one where our users live or use STAR LUX’s services. We do so in order to fulfill our agreements with users, such as our Terms of Use, or based on users’ prior consent, adequacy decisions for the relevant countries.

1. THE INFORMATION WE COLLECT

When you use the Star Lux Platform, we collect the information you provide, usage information, and information about your device. Here are the types of information we collect about you:

1.1 INFORMATION YOU PROVIDE TO US

- **Account Registration.** When you create an account with Star Lux, we collect the information you provide us, such as your name, email address, phone number, birth date, and payment information. You may choose to share additional info with us for your Rider profile, like your photo or saved addresses (e.g., home or work), and set up other preferences (such as your preferred pronouns).

- **Driver Information.** If you apply to be a Driver, we will collect the information you provide in your application, including your name, email address, phone number, birth date, profile photo, physical address, government identification number (such as social security number), driver's license information, vehicle information, and car insurance information. We collect the payment information you provide us, including your bank routing numbers, and tax information.
- **Background check and identity verification (drivers and delivery persons):** This may include information such as driver history or criminal record (where permitted by law), license status, known aliases and prior addresses, and right to work.
- **Demographic data:** We may collect demographic data about users, including through user surveys. In some countries, we may also receive demographic data about users from third parties.
- **Ratings and Feedback.** When you rate and provide feedback about Riders or Drivers, we collect all the information you provide in your feedback.

1.2 DATA CREATED DURING USE OF OUR SERVICES

This includes:

- **Address Book Contacts.** You may set your device permissions to grant Star Lux access to your contact lists and direct Star Lux to access your contact list, for example to help you refer friends to Star Lux. If you do this, we will access and store the names and contact information of the people in your address book.
- **Safety recordings:** In certain jurisdictions, and where permitted by law, users can record the audio and/or video of their trips through an in-app feature or using a dashcam.
- **Usage Information.** We collect information about your use of the Star Lux Platform, including ride information like the date, time, destination, distance, route, payment, and whether you used a promotional or referral code. We also collect information about your interactions with the Star Lux Platform like our apps and websites, including the pages and content you view and the dates and times of your use.
- **Location Information.** Great rides start with an easy and accurate pickup. The Star Lux Platform collects location information (including GPS and Wi-Fi data) differently depending on your Star Lux app settings and device permissions as well as whether you are using the platform as a Rider or Driver:

Riders: We collect your device's precise location when you open and use the Star Lux app, including while the app is running in the background from the time you request a ride until it ends. Star Lux also always tracks the precise location of scooters and e-bikes.

Drivers: We collect your device's precise location when you open and use the app, including while the app is running in the background when it is in driver mode. We also collect precise location for a limited time after you exit driver mode in order to detect ride incidents and continue collecting it until a reported or detected incident is no longer active.

- **Communications Between Riders and Drivers.** We work with a third party to facilitate phone calls and text messages between Riders and Drivers without sharing either party's actual phone number with the other. But while we use a third party to provide the communication service, we collect information about these communications, including the participants' phone numbers, the date and time, and the contents of SMS messages.

1.3 INFORMATION WE COLLECT FROM THIRD PARTIES

Third-Party Services. Third-party services provide us with information needed for core aspects of the Star Lux Platform, as well as for additional services, programs, loyalty benefits, and promotions that can enhance your Star Lux experience. These third-party services include background check providers, insurance partners, financial service providers, marketing providers, and other businesses

Data from other sources. These include:

- Publicly available sources
- Marketing service providers or data resellers whose data Star Lux uses for marketing or research
- Law enforcement officials, public health officials, and other government authorities
- Star Lux account owners who request services for or on behalf of other users, or who enable such users to request or receive services through their accounts. This includes owners of Star Lux for Business accounts.
- Users or others providing information in connection with claims or disputes.
- Star Lux business partners in connection with debit or credit cards issued by a financial institution in partnership with Star Lux to the extent disclosed in the terms and conditions for the card, Information to operationalize loyalty and promotional programs or applications, services, or features you choose to connect or link to your Star Lux account, such as information about your use of such programs, applications, services, or features; and
- Information about you provided by specific services, such as demographic and market segment information.
- **Enterprise Programs.** If you use Star Lux through your employer or other organization that participates in one of our Star Lux Business enterprise programs, we will collect information about you from those parties, such as your name and contact information.
- **Referral Programs.** Friends help friends use the Star Lux Platform. If someone refers you to Star Lux, we will collect information about you from that referral including your name and contact information.
- **Other Users and Sources.** Other users or public or third-party sources such as law enforcement, insurers, media, or pedestrians may provide us information about you.

1.4 HOW WE USE PERSONAL DATA

Star Lux uses personal data to enable reliable and convenient transportation, delivery, and other products and services. We also use such data:

We use your personal information to:

- Maintain the security and safety of the Star Lux Platform and its users.
- Build and maintain the Star Lux community.
- For customer support
- For research and development
- To enable communications between users
- Improve the Star Lux Platform; and
- Respond to legal proceedings and obligations.

- We use personal data we collect:

1. To provide our services. Star Lux uses data to provide, personalize, maintain, and improve our services.

This includes using data to:

- Create/update accounts
- Enable transportation and delivery services (such as using location data to facilitate a rider or order pickup or delivery), features that involve data sharing (such as fare splitting, ETA sharing, and ratings and compliments), and accessibility features to facilitate use of our services by those with disabilities.
- Process payments
- Collect feedback regarding your experience.
- Facilitate insurance, vehicle, invoicing, or financing solutions.
- perform necessary operations to maintain 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.
- Facilitate additional services and programs with third parties; and
- Operate contests, sweepstakes, and other promotions.

2. Maintaining the Security and Safety of the Star Lux Platform and its Users. Providing you a secure and safe experience drives our platform, both on the road and on our apps. To do this, we use your personal information to:

- Authenticate users.
- Verify that Drivers and their vehicles meet safety requirements.
- Investigate and resolve incidents, accidents, and insurance claims.
- Where permitted by law, we may also use selfies to verify that users are wearing masks, helmets or other safety gear using object verification technology, where permitted by law.
- Encourage safe driving behavior and avoid unsafe activities.
- Find and prevent fraud.

3. Building and Maintaining the Star Lux Community. Star Lux works to be a positive part of the community. We use your personal information to:

- Help facilitate donations you choose to make through the Star Lux Platform.
- Communicate with you about events, promotions, elections, and campaigns.

Star Lux performs the above activities on the grounds that they are necessary to fulfill our obligations to users under our Terms of Use or other agreements with users.

4. Customer support. Star Lux uses the information we collect (which may include call recordings) to provide customer support, including to investigate and address user concerns and to monitor and improve our customer support responses and processes.

5. Enabling communications between users. For example, a driver may message or call a rider to confirm a pick-up location, a rider may contact a driver to retrieve a lost item, or a restaurant or delivery person may call an order recipient with information about their order.

6. Responding to Legal Proceedings and Requirements. Sometimes the law, government entities, or other regulatory bodies impose demands and obligations on us with respect to the services we seek to provide. In such a circumstance, we may use your personal information to respond to those demands or obligations.

7. Automated decision-making. We use personal data to make automated decisions relating to use of our services. This includes:

- Using driver location information, and communications between riders and drivers, to identify cancellation fees earned or induced through fraud. For example, if we determine by using such information that a driver is delaying a rider pickup in order to induce a cancellation, we will not charge the rider a cancellation fee and will adjust the amounts paid to the driver to omit such a fee.
- Matching available drivers and delivery persons to users requesting services. Users can be matched based on availability, proximity, and other factors such as likelihood to accept a trip based on their past behavior or preferences.
- Using driver data (such as location, rating and gender) and rider data (such as rating, origin and destination) to help avoid pairings of users that may result in increased risk of conflict.

1.5 HOW WE SHARE YOUR INFORMATION

1.5.1 Sharing Between Star Lux Users

- *Riders and Drivers*
 - Rider information shared with Driver:* Upon receiving a ride request, we share with the Driver the Rider's pickup location, name, profile photo, rating, Rider statistics (like approximate number of rides and years as a Rider), and information the Rider includes in their Rider profile (like preferred pronouns). Upon pickup and during the ride, we share with the Driver the Rider's destination and any additional stops the Rider inputs into the Star Lux app.
 - Driver information shared with Rider:* Upon a Driver accepting a requested ride, we will share with the Rider the Driver's name, profile photo, preferred pronouns, rating, real-time location, and the vehicle make, model, color, and license plate, as well as other information in the Driver's Star Lux profile, such as information Drivers choose to add (like country flag and why you drive) and Driver statistics (like approximate number of rides and years as a Driver).
- *With other users*

This includes sharing:

-Riders' first name, rating, and pickup and/or drop off locations with drivers

-Riders' first name with other riders in a carpool trip. Riders in carpool trips may also see the drop off location of the other riders.

-Order recipients' first name, delivery address, and order information with the restaurant or merchant and, for order deliveries, with the delivery person. We may also share ratings and feedback, or other information to the extent required by law, with the restaurant or merchant and, for order deliveries, the delivery person.

- *With the general public*
-Questions or comments from users submitted through public forums such as Star Lux blogs and Star Lux social media pages may be viewable by the public, including any personal data included in the questions or comments submitted by a user.
- *With Star Lux subsidiaries and affiliates*
-We share personal data with our subsidiaries and affiliates to help us provide our services or conduct data processing on our behalf. For example, STAR LUX processes and stores such data in the United States on behalf of its international subsidiaries and affiliates.

1.5.2 At the user's request

This includes sharing data with:

-Other people at the user's request. For example, we share a user's ETA and location with a friend when requested by that user, or a user's trip information when they split a fare with a friend.

-STAR LUX business partners. For example, if a user requests a service through a partnership or promotional offering made by a third party, STAR LUX may share certain data with those third parties.

1.5.3 Rides Requested or Paid for by Others

Some rides you take may be requested or paid for by others. If you take one of those rides using your Star Lux Business Profile account, a code or coupon, a subsidized program (e.g., transit or government), or a corporate credit card linked to another account, or another user otherwise requests or pays for a ride for you, we may share some or all of your ride details with that other party, including the date, time, charge, rating given, region of trip, and pick up and drop off location of your ride.

1.6 SHARING WITH THIRD-PARTY SERVICE PROVIDERS FOR BUSINESS PURPOSES

Depending on whether you're a Rider or a Driver, Star Lux may share the following categories of your personal information for a business purpose to provide you with a variety of the Star Lux Platform's features and services:

- Internet or other electronic network activity information, such as your IP address, type of browser, version of operating system, carrier and/or manufacturer, device identifiers, and mobile advertising identifiers; and
- Location data.
- Personal identifiers, such as your name, address, email address, phone number, date of birth, government identification number (such as social security number), driver's license information, vehicle information, and car insurance information.
- Financial information, such as bank routing numbers, tax information, and any other payment information you provide us.
- Commercial information, such as ride information, Driver/Rider statistics and feedback, and Driver/Rider transaction history.

1.7 HOW WE STORE AND PROTECT YOUR INFORMATION

We retain your information for as long as necessary to provide you and our other users the Star Lux Platform. This means we keep your profile information for as long as you maintain an account. We retain transactional information such as rides and payments for at least seven years to ensure we can perform legitimate business functions, such as accounting for tax obligations.

Following an account deletion request, Star Lux deletes the user's account and data, unless they must be retained due to legal or regulatory requirements, for purposes of safety, security, and fraud prevention, or because of an issue relating to the user's account such as an outstanding credit or an unresolved claim or dispute. Because we are subject to legal and regulatory requirements relating to drivers and delivery persons, this generally means that we retain their account and data for a minimum of 7 years after a deletion request. For riders and order recipients, their data is generally deleted within 90 days of a deletion request, except where retention is necessary for the above reasons.

2. CHOICE AND TRANSPARENCY

Star Lux enables users to access and/or control data that STAR LUX collects, including through:

- In-app ratings pages
- Marketing choices
- Privacy settings
- Device permissions
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Star Lux also enables users to request access to or copies of their data, changes or updates to their accounts, or deletion of their accounts, or that STAR LUX restricts its processing of user personal data.

1.8.1 Privacy settings

- Share Live Location (Riders)

Riders can enable/disable Star Lux to share their real-time location data from their mobile devices with their drivers through their device settings.

- Location data collection (riders and order recipients)

Riders and order recipients can enable/disable Star Lux to collect location data from their mobile devices through their device settings.

- Notifications: account and trip updates

Star Lux provides users with trip status notifications and updates related to activity on their account. These notifications are a necessary part of using the Star Lux app and cannot be disabled.

3. ALL USERS

Profile Information. You can review and edit certain account information you have chosen to add to your profile by logging in to your account settings and profile.

Location Information. You can prevent your device from sharing location information through your device's system settings. But if you do, this may impact Star Lux ability to provide you our full range of features and services.

Cookie Tracking. You can modify your cookie settings on your browser, but if you delete or choose not to accept our cookies, you may be missing out on certain features of the Star Lux Platform.

Email Subscriptions. You can always unsubscribe from our commercial or promotional emails by clicking unsubscribe in those messages. We will still send you transactional and relational emails about your use of the Star Lux Platform.

Push Notifications. You can opt out of receiving push notifications through your device settings. Please note that opting out of receiving push notifications may impact your use of the Star Lux Platform (such as receiving a notification that your ride has arrived).

Accessing data: Users can access data including their profile data and trip or order history through the Star Lux apps or via Star Lux website.

Changing or updating data: Users can edit the name, phone number, email address, payment method, and photo associated with their account through the Settings menu in Star Lux apps or driver portal.

Objections, restrictions, and complaints: Users may request that we stop using all or some of their personal data, or that we limit our use of their data. This includes objecting to our use of personal data that is based on Star Lux legitimate interests.

4. CHILDREN'S DATA

Star Lux is not directed to children, and we don't knowingly collect personal information from children under the age of 13. If we find out that a child under 13 has given us personal information, we will take steps to delete that information. If you believe that a child under the age of 13 has given us personal information, please contact us at our Help Center.