



Privacy Policy MaaS4EU - Wave 1 - survey tool

Data Controller and Owner

Types of Data collected

MaaS4EU requires the registration of the user through the MaaS4EU website. The information requested during the registration process includes but is not limited the following: gender, username, information on vehicle ownership and Twitter/Facebook account. Among the types of Personal Data that this Application collects, by itself or through third parties, there are: General activity data, Movement activity, Gender, Username, Profession and Geographic position.

Other Personal Data collected may be described in other sections of this privacy policy or by dedicated explanation text contextually with the Data collection.

The Personal Data may be freely provided by the User, or collected automatically when using this Application. In addition, MaaS4EU application may automatically collect the following information: (a) ID of your mobile device; (b) mobile operating system; and (c) information about application usage.

Any use of Cookies - or of other tracking tools - by this Application or by the owners of third party services used by this Application, unless stated otherwise, serves to identify Users and remember their preferences, for the sole purpose of providing the service required by the User.

Failure to provide certain Personal Data may make it impossible for this Application to provide its services.

Users are responsible for any Personal Data of third parties obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

Registered users may choose at any time to stop allowing us to have access to their location data with one of the below ways:

- By disabling the MaaS4EU Tracking via the MaaS4EU Tracking button (set to OFF). This will discontinue all data collection until you enable MaaS4EU Tracking again (set MaaS4EU Tracking to ON);
- By uninstalling the MaaS4EU application from their mobile devices.
- By sending an email to info@maas4eu.eu, requesting the removal of your data from our databases. MaaS4EU Team will comply with all requests for data removal.

Mode and place of processing the Data



Data controller

The data is collected in Europe, by tools that have been developed by UAEGEAN and UCL. These two organisations are the data controllers and are based in Europe. More specifically, UAEGEAN is the data controller of the registration, tracking and trip validation data, and UCL is the data controller of the questionnaire data. These organisations store the data on servers that are located in Europe; more specifically UAEGEAN stores the data on a server that is based in Greece, while UCL stores the data on a server based in the UK. The questionnaire data from UCL is anonymised and then transferred to UAEGEAN that hosts the complete database. Both organisations that are data controllers follow GDPR standards as well. The data processors for the Wave 1 data is UCL and UAEGEAN.

UK data protection authority: ICO – Information Commissioner’s Office
(<https://ico.org.uk/>)

Greek data protection authority: DPA – Hellenic Data Protection Authority
(<http://www.dpa.gr/>)

Methods of processing

The Data Controller processes the Data of Users in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data. The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Data Controller, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the site (administration, sales, marketing, legal, system administration) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Data Controller at any time.

Place

The Data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Data Controller.

Retention time

The Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this document, and the User can always request that the Data Controller suspend or remove the data.

The use of the collected Data

The Data concerning the User is collected to allow the MaaS4EU Team to provide its services, as well as for the following purposes: Access to third party services' accounts, Handling activity data, Registration and authentication and Location- based



interactions.

The Personal Data used for each purpose is outlined in the specific sections of this document.

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

— Access to third party services' accounts

- These services allow this Application to access Data from your account on a third party service and perform actions with it.
- These services are not activated automatically, but require explicit authorization by the User.



— **Access to the Twitter account (Twitter, Inc.)**

- This service allows this Application to connect with the User's account on the Twitter social network, provided by Twitter, Inc.
- Personal Data collected: Various types of Data as specified in the privacy policy of the service.
- Place of processing : USA – [Privacy Policy](#)

Handling activity data

These services allow the Owner to use the activity data collected by your device in order for this Application to operate or to provide specific features. This may include movements, heartbeat, change in altitude or data about the surroundings. Depending on what is described below, third parties may be involved in the activity tracking. Most devices allow for the User to control which Data is accessed or stored.

Activity data tracked by your device (MaaS4EU app)

This Application uses some activity data tracked by your device to operate or to provide specific features. Personal Data collected: Gender, General activity data and Movement activity.

Location-based interactions Geolocation (MaaS4EU app)

This Application may collect, use, and share User location Data in order to provide location-based services. Most browsers and devices provide tools to opt out from this feature by default. If explicit authorization has been provided, the User's location data may be tracked by this Application. Personal Data collected: Geographic position.

Registration and authentication

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, this Application will be able to access some Data, stored by these third party services, for registration or identification purposes.

Direct registration (MaaS4EU app)

The User registers by filling out the registration form and providing the Personal Data directly to this Application. Personal Data collected: Gender, Profession and Username.

Additional information about Data collection and processing

Legal action



The User's Personal Data may be used for legal purposes by the Data Controller, in Court or in the stages leading to possible legal action arising from improper use of this Application or the related services.

The User declares to be aware that the Data Controller may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular services or the collection and processing of Personal Data upon request.

System Logs and Maintenance

For operation and maintenance purposes, this Application and any third party services may collect files that record interaction with this Application (System Logs) or use for this purpose other Personal Data (such as IP Address).

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Data Controller at any time. Please see the contact information at the beginning of this document.

The rights of Users

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller at the contact information set out above. This Application does not support "Do Not Track" requests. To determine whether any of the third party services it uses honor the "Do Not Track" requests, please read their privacy policies.

Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. If a User objects to any of the changes to the Policy, the User must cease using this Application and can request that the Data Controller removes the Personal Data. Unless stated otherwise, the then-current privacy policy applies to all Personal Data the Data Controller has about Users.



Information about this privacy policy

The Data Controller is responsible for this privacy policy.

Definitions and legal references

Personal Data (or Data)

Any information regarding a natural person, a legal person, an institution or an association, which is, or can be, identified, even indirectly, by reference to any other information, including a personal identification number.

Usage Data

Information collected automatically from this Application (or third party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Application, which must coincide with or be authorized by the Data Subject, to whom the Personal Data refer.

Data Subject

The legal or natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural person, legal person, public administration or any other body, association or organization authorized by the Data Controller to process the Personal Data in compliance with this privacy policy.

Data Controller (or Owner)

The natural person, legal person, public administration or any other body,



association or organization with the right, also jointly with another Data Controller, to make decisions regarding the purposes, and the methods of processing of Personal Data and the means used, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

This Application

The hardware or software tool by which the Personal Data of the User is collected.

Legal information

Notice to European Users: this privacy statement has been prepared in fulfillment of the obligations under Art. 10 of EC Directive n. 95/46/EC, and under the provisions of Directive 2002/58/EC, as revised by Directive 2009/136/EC, on the subject of Cookies. This privacy policy relates solely to this Application.

Changes

This Privacy Policy may be updated from time to time for any reason. We will notify you of any changes to this policy by posting the new policy to MaaS4EU website and via a notification on MaaS4EU app.

Consent

By using the MaaS4EU Application, you are consenting to our processing of User Provided and Automatically Collected information as set forth in this Privacy Policy now and as amended by us in the future. "Processing," means using cookies on a computer/hand held device or using or touching information in any way, including, but not limited to, collecting, storing, deleting, using, combining and disclosing information.

Contact

If you have any questions regarding privacy while using the MaaS4EU Application, or if you have any questions about our privacy practices, please contact us via email at: info@maas4eu.eu.