



# Car Sharing Privacy policy

VALID FROM 1 AUGUST 2025

## Introduction

We know everyone says it, but at Lync & Co, protecting your privacy is one of our top concerns. With openness being one of our core values, we want to give you as clear and transparent information as possible about how we use your personal data, so you can feel confident when using our products and services. This privacy policy describes how Lync & Co processes your personal data when using Car Sharing.



Your experience of Lync & Co builds on several components that are designed to work together. Therefore, Lync & Co has other privacy policies that should be read alongside this policy for a complete picture of the data processing. All policies are available on [lynkco.com/privacy](https://lynkco.com/privacy).

Car Sharing requires Connected Services and Vehicle Location Data to be activated in the vehicle, in order for Car Sharing to work as intended. During a Car Sharing session, Connected Services and Vehicle Location Data will therefore be active and locked by default, and the settings for these services cannot be altered by a borrower. More information about how Lync & Co processes personal data when you are using a Lync & Co vehicle can be found in the Car Privacy Policy.

To learn more about how Lync & Co processes and protects your personal data, please visit [lynkco.com](https://lynkco.com).

## Who we are

We, Lync & Co International AB ("Lync & Co", "we", or "us" are responsible for processing your personal data referred to below. Our registered office is at Planetgatan 6, SE-417 55 Gothenburg, Sweden, with company registration number 559151-8161. Where any other data controller is involved in the processing, this is specified below.

## When and why we process your personal data

In this section, you will find more detailed information about why we process your personal data, the categories of data, our legal basis for the processing, as well as for how long we retain your data for each purpose.

### Creating and administering your Car Sharing profile



Purpose	To create and administer your Car Sharing profile with your Lynk & Co account and provide access to the Car Sharing platform.
Categories of personal data	Lynk & Co account (name, date of birth, address, e-mail address, phone number), <b>profile photo, driver's license information (number, category, date of obtainment, and expiry date)</b> , date and time of verification, peer-to-peer rating (your profile rating given by other users), and peer-to-peer chat communication (message content and history, read receipts, IP addresses and meta data).
Legal basis	Performance of contract  In case you have access to Car Sharing as an employee of one of our business customers, our legal basis for processing your personal data is that it is necessary for the purpose of our legitimate interest to deliver the service under that business-to-business agreement.
Retention	For the lifetime of the Lynk & Co account and up to three (3) months thereafter as required to establish whether further storage is needed to establish, enforce or defend legal claims.
Controller(s)	Lynk & Co

## Identity- and driver's license verification

Purpose	To verify your identity and driver's license.
Categories of personal data	Lynk & Co account (name, date of birth, address, e-mail address), photocopies of your <b>driver's license</b> , biometric image data, document and facial similarity verification reports (authenticity, consistency and image integrity), and watchlist reports (legal and regulatory warnings, politically exposed persons and checks sanction lists imposed by the EU and UN).
Legal basis	Legal obligation  We are required by law to check that you have a valid driver's license.  Your consent  To verify your driver's license, we use facial recognition technology that entails processing of biometric data. Since biometric data constitutes a special category of personal data, the driver's license verification process is subject to your explicit consent. If you do not consent to this processing, or you recall your consent, you will not be able to access Car Sharing.
Retention	When your identity and driver's license has been successfully verified, we will retain your driver's license number, date of obtainment, expiry date and

issuing country as well as a note that a verification was performed for the lifetime of the Lynk & Co account and up to three (3) months thereafter as required to determine whether further storage is needed to establish, enforce or defend legal claims.

Biometric image data and **driver's license photocopies are retained** for the duration of the verification process and up to thirty (30) days thereafter.

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Controller(s)

Lynk & Co

## Automated decision-making including profiling

When you register a Car Sharing profile, we use automated decision-making for the purpose of conducting know-your-customer checks, including **identity and address verification, payment method verification, driver's license validation, and checks against sanction lists**. The use of automated decision-making means that you **may not be able to access Car Sharing based on your age, that your driver's license is invalid or the number of years for which you've had a driver's license, or that you are subject to sanctions**. This information is relevant when we conduct a risk assessment, determining that it is not commercially desirable to allow access to Car Sharing to **individuals below a certain age, that do not fulfil our driver's license requirements, without a valid payment method, or individuals that are subject to sanctions imposed by the EU and UN**. For more information on from where we get your personal data, see Section "Where we get your personal data from".

You have the right not to be subject to a decision that is solely based on automated decision-making, including profiling, if the decision has legal consequences for you or significantly affects you in another way. However, we have the right to use automated decision-making as it is necessary for the conclusion or performance of a contract between you and us or if you have given your consent to the processing.

We use automated decision making to:

1. verify your identity and address;
2. determine whether you meet our age and driver's license requirements;
3. verify your payment method; and
4. conduct checks against sanction lists imposed by the EU and UN.

If you are not approved in the above-described automated decisions, you will not be able to access Car Sharing. We have several security mechanisms in place to ensure that decisions are accurate, including frequent reviews of our decision models and random sampling in individual cases. If you have any concerns about the outcome, you can contact us with your opinion and contest the decision. For contact details, please see Section "Contact us" at the end of this policy.

## Administrating bookings and sharing sessions

Purpose

To administer sharing sessions, including to hide or display vehicles as available for sharing at the request of their owners or users, and to distribute and revoke the digital key at the start and end of each session.

To administer insurance coverage.

To enable peer-to-peer user rating and communication.

To calculate payments, earnings, fees and commissions.

To prevent abusive behavior, fraud and misuse of our services, safeguard our rights under the Car Sharing terms and conditions, including to be able to readdress fees, fines, and other costs (such as speeding or parking tickets) back to you in case such costs have been addressed to us when we are the owner of the vehicle, but for which you are responsible.

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Categories of personal data

Lynk & Co account (name, date of birth, address, e-mail address), profile photo, details of your Car Sharing booking (requests and cancellations, duration, start and stop events, distances driven, fuel or electricity use) vehicle identification number (VIN), vehicle door lock status and events, vehicle position (for the purpose of availability display, pickup and drop-off), session details (time and location of pick-up and drop-off as well as the total session duration), vehicle odometer, electricity and fuel values before and after the session, vehicle condition reports and damage logs, lender pricing information (hourly and daily rates), earnings and payments, peer-to-peer rating, comments and chat communication, **driver's license** information (issuing country, number, category, date of obtainment, and expiry date).

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Legal basis

Performance of contract

In case you have access to Car Sharing as an employee of one of our business customers, our legal basis for processing your personal data is that it is necessary for the purpose of our legitimate interest to deliver the service under that business-to-business agreement.

For location-based features (to make your vehicle available for Car Sharing and to see nearby vehicles available for Car Sharing), you must have location services enabled in your vehicle and mobile device and select at least "Once" for iOS or "Ask every time" for Android. Location data from the mobile device position is not shared with Lynk & Co.

To unlock the vehicle using Digital Key, you must enable Bluetooth, and the location services in your mobile device needs to be set to "Always while using app" for iOS or "All the time" for Android. On Android 13 and up, you will need to allow connection to "Nearby Devices".

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Retention

For the lifetime of the Lynk & Co account and up to twelve (12) months thereafter in order to be able to handle any complaints, and, as long as necessary to establish, enforce or defend legal claims.

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Controller(s)

Lynk & Co

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## Administering insurance for Car Sharing

Purpose

To administer vehicle condition reports, insurance coverage and damage handling with our insurance partners.

Categories of personal data	Lynk & Co <b>account</b> , driver's license number, date of obtainment, expiry date and issuing country, vehicle identification number (VIN), vehicle condition reports (photos of the vehicle captured by the borrower before and after the session, time and date of capture), damage report number, market, session reference and details of the session), information provided by you in the course of reporting a damage or otherwise generated by your use of the vehicle.
Legal basis	Performance of contract  In case you have access to Car Sharing as an employee of one of our business customers, our legal basis for processing your personal data is that it is necessary for the purpose of our legitimate interest to deliver the service under that business-to-business agreement.
Retention	Until the investigation of the resulting damage has been completed and any compensation from the insurance company has been paid and for up to five (5) years thereafter.
Controller(s)	Lynk & Co

## Payments, earnings and receipts

Purpose	To process payments, payouts and receipts.
Categories of personal data	Lynk & Co account, identifiers, payment method (card type and number, expiry date, security code), timestamps, transactional identifiers, amounts, invoicing address, lender pricing information (hourly and daily rates), booking reference and details (duration, distances driven, fuel or electricity use).  Your payment method (card details) and user identifiers will be collected and processed directly by our payment services provider (Stripe Payments Europe, Limited) who acts as the data controller for personal data collected through credit or debit card payments. We do not see or access your personal data related to payments or your payment method, except for payment confirmations and amounts.  As Car Sharing is a peer-to-peer platform, your name and address will be present on the corresponding invoice or receipt.
Legal basis	Performance of contract  In case you have access to Car Sharing as an employee of one of our business customers, our legal basis for processing your personal data is that it is necessary for the purpose of our legitimate interest to deliver the service under that business-to-business agreement.

Retention	For the lifetime of the Lynk & Co account and in accordance with applicable laws relating to bookkeeping and financial reporting, which vary by region. For most customers, that requires at least 7 (seven) years.
Controller(s)	Lynk & Co Stripe Payments Europe, Limited

## Bookkeeping and tax reporting

Purpose	To maintain bookkeeping of financial transactions. To facilitate earnings and tax reporting to The Swedish Tax Agency, who may share the personal data with the tax authority in your country.
Categories of personal data	Name, date of birth, address, transaction information, payment and invoice details, taxpayer identification number (TIN) or value-added tax (VAT) number, sharing history (earnings, taxes, fees and commissions).
Legal basis	Legal obligation The Car Sharing platform is a peer-to-peer marketplace. As the operator of the Car Sharing platform, Lynk & Co needs to report earnings, personal, and business information about car lenders to tax authorities once a year.
Retention	For the lifetime of the Lynk & Co account and in accordance with applicable laws relating to financial reporting, which vary by region. For most customers, that requires at least 7 (seven) years.
Controller(s)	Lynk & Co

To comply with laws, voluntary undertakings and to establish, defend or enforce legal claims, including disclosure to law enforcement, authorities, and emergency services

Purpose	We may use and disclose your personal data for legal reasons that we deem necessary and appropriate, including to comply with applicable laws and regulations; handle or otherwise respond to claims for damages, including bodily or property damage; recover vehicles that we own or collect any payment claims, e.g. debt collection agencies; respond to requests from law enforcement, emergency services and other public bodies and authorities; enforce our terms; protect our and/or our group companies', yours or others'
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rights, integrity, safety or property; protect our or our group companies' operations; and enable us to enforce available penalties or limit the damages that we may incur.

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Categories of personal data	The categories of personal data relating to the data subjects that are deemed necessary by us or the requesting authority. We only provide data that is explicitly requested or otherwise strictly necessary.
Legal basis	Legal obligation Legitimate interest  This processing will be carried out when required by law or otherwise for our legitimate interests to establish, defend or enforce legal claims. We may also provide information to authorities when necessary to satisfy such authorities' legitimate interest in investigating crimes or violations of laws or regulations and/or our own legitimate interest in enforcing the Car Sharing Terms and Conditions.
Retention	We keep records of the requests received and responses provided up to two (2) years after the request has been handled.
Controller(s)	Lynk & Co

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## Research and development of products and services

Purpose	To measure interest and usability of our products and services in order to improve them individually and how they work together (including producing reports, statistics and analysis for this purpose).
Categories of personal data	All personal data that we have about you for other purposes listed in this privacy policy (except biometric image data and driver's license verification data).
Legal basis	Legitimate interests
Retention	The data is not saved specifically for this purpose but will be used for this purpose during the general retention period for each purpose. Where possible, we restrict analysis to anonymized or pseudonymized data. All statistical reports will be anonymous.
Controller(s)	Lynk & Co

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# How we share your personal data

To run our business and provide our products and services, we work closely with select service providers and business partners, as well as companies within the Lynk & Co group. When we refer to “service providers”, “suppliers” or “sub-processors”, those organizations are contractually bound to process your personal data under our supervision and only for specific purposes. When we refer to “partners”, “authorities” and “law enforcement” and “issuers of fees”, those organizations are processing your personal data as independent data controllers. We never share more information than what is strictly necessary for each supplier or partner to provide their services.

**Insurance partners.** In order to enable insurance coverage, accident and damage handling, we share personal data with our insurance partners, through which Car Sharing users and the vehicle is insured during sharing.

**Payments and financial partners.** In order to process payments, payouts, invoicing and receipts, we share your personal data with our payment service provider and financial partner.

**Service providers.** We disclose your personal data to select suppliers that manage the operation, technical support and maintenance of various IT services that we use, such as cloud services and various business support applications, as well as identity and driver’s license verification services, analytics services, and peer-to-peer chat services.

**Group companies and affiliates.** We disclose personal data to other companies within the Lynk & Co group that provide customer support and business support systems.

**Business partners.** We may disclose personal data to auditors (financial, regulatory) and legal counsels. Where possible, we limit their access to pseudonymized or anonymized information.

**Authorities and law enforcement.** As the operator of the Car Sharing platform, we are required to share your personal data on Car Sharing earnings with the Swedish Tax Agency, who may share the personal data with the tax authority in your country for taxation.

In response to a valid and lawful request such as a court order, subpoena or other legal process by government or law enforcement authorities such as the police, public courts, privacy protection authorities or other governmental bodies, we may be legally required to disclose personal data about you and/or your vehicle. Your personal data may also be disclosed when necessary to protect the rights, property, or safety of you, us or others or otherwise as necessary to establish, defend ourselves against or enforce our own legal claims. Any request for data disclosure is carefully reviewed to ensure that it’s valid, lawful, and proportionate before any information is disclosed.

**Issuers of fees, fines and other costs.** If fees, fines or other costs (e.g. speeding or parking tickets) for which you are responsible are addressed to us when we are the owner of the vehicle, we will share your name, address, contact details (and, if applicable and required, your driver’s license number, date of obtainment and expiry date) with the third party who issued them.

## International transfers

While most of our data processing takes place within the EU or EEA area, we also work with service providers and suppliers located outside the EU and EEA.

Whenever we conduct international transfers of personal data, each transfer is subject to appropriate safeguards that makes sure each transfer complies with applicable law, and that your personal data is afforded the same level of protection as within the EU/EEA. These safeguards may include the implementation of EU Standard Contractual Clauses as issued by the European Commission, that the recipient is certified under

the EU-U.S. Data Privacy Framework, or that the relevant country has been declared by the European Commission as having an adequate level of protection. In addition, we implement additional technical and organizational security measures when needed, such as encryption and pseudonymization.

Country	Recipients	Purpose	Safeguard
United States	Service providers	Cloud services, business support applications, analytics	EU-U.S. Data Privacy Framework EU Standard Contractual Clauses
United Kingdom	Service providers	Payment services Peer-to-peer chat Identity and driver's license verification	Adequacy Decision

## Your rights

Because it's your personal data, the law gives you certain data rights allowing you to have insight and exercise control over our use of your personal data. The applicability and extent of these rights vary depending on the specific processing situation, but always gives you the right to information about how your personal data is being used. If you want to exercise any of these rights, contact us using the contact information at the end of this policy. Read below for descriptions of the rights you have.

### Right to information and access

You have the right to know if we are processing personal data about you, and if we do, you have the right to receive information about the personal data and why we're using it, how it is shared, and for how long we store it. You also have the right to receive a copy of the personal data we have about you.

### Right to have your personal data deleted

In some cases, you have a right to have your personal data deleted. This is the case when

5. the personal data is no longer needed for the purposes it was collected for,
6. you withdraw a consent you have given and we have no other legal basis to process the personal data,
7. the personal data is used for direct marketing and you unsubscribe from it,
8. you object to our processing on the basis of 'legitimate interests' and we are unable to demonstrate reasons for the processing which override your interests and rights,
9. the data has been processed unlawfully, or
10. deletion is required by law.

### Right to object

You have the right to object to our use of your personal data when our ground for using it is our "legitimate interest" or when we use it for marketing purposes. In some cases, we can continue to use your personal data even if you have objected to our processing. This can be the case if we can show compelling legitimate reasons for the continued use that outweigh your interests, or if it is for the purpose of establishing, exercising or defending ourselves against legal claims.

### Right to rectification

You have a right to correct or update any inaccurate personal data about you that we have and to ask us to have incomplete personal data completed. We may need to verify the accuracy of the new data you provide to us.

### Right to restriction

You also have a right to request that we restrict our use of your personal data. That is the case for example when the accuracy of the personal data is contested by you, or the processing is unlawful, but you do not want us to delete it and instead you request that we restrict our use of it.

### Right to lodge a complaint to a supervisory authority

You always have the right to lodge a complaint with a supervisory authority. You may do this in the EU/EEA member state where you live. For Lynk & Co International AB, the Swedish Authority for Privacy Protection (in Swedish; Integritetsskyddsmyndigheten, "IMY") is our primary supervisory authority. You also have the right to contact your national supervisory authority directly, and to seek a remedy from a national court.

### Right to data portability

When our use of your personal data is based on your consent or on a contract, you have the right to obtain a copy of the personal data that you have provided to us in a structured, commonly used and machine-readable format and transfer it to another company of your choice ("data portability").

### Right to withdraw your consent

At any given time, you have the right to withdraw any given consents to our use of your personal data.

## Contact us

If you have any questions about your personal data, or if you want to exercise any of your rights, please contact us at [hello@lynkco.com](mailto:hello@lynkco.com). For contact details to Lynk & Co in your country, please visit [lynkco.com](http://lynkco.com).

Lynk & Co has appointed a Data Protection Officer who can be contacted at [dpo@lynkco.com](mailto:dpo@lynkco.com).

## Changes to this Privacy Policy

We reserve the right to update this Privacy Policy at any time. The latest version will always be available on [lynkco.com](http://lynkco.com) as well as from the Car Sharing in-car app and Lynk & Co app. We may also notify you in other ways from time to time about how we use your personal data.