



Cookie Policy

1. General information

This Cookie Policy governs the usage of cookies by KOWO BVBA/SPRL, with registered offices at 1050 Brussels, Avenue Emile de Béco 83, a company listed in the Belgian Trade and Companies Register under number 0662.515.146 (hereafter “KOWO”) through its business activities and its website www.kowo.io subdomains and/or folders, applications, services and any other means relating to information or communication, including emails (collectively referred to as “Platform”).

Cookies are being collected from the UsersUser of the Platform in accordance with the provisions of this Cookie Policy.

2. How KOWO uses cookies

1. What are cookies?

A cookie is a small piece of data sent from a website and stored in a User’s web browser. When the User browses the same website in the future, the data stored in the cookie can be retrieved by the website to notify the website of the User’s previous activity. It helps the website to remember information about the User’s visit. The User can choose to turn cookies on or off. Cookies do not typically contain any information that personally identifies a User, but personal information that we store about you may be linked to the information stored in and obtained from cookies. Further information on cookies can be found on <http://www.allaboutcookies.org/> or <http://www.aboutcookies.org/>.

2. Purposes of the use of cookies

KOWO uses cookies to remember the preferences of the User on the Platform and to show more relevant services and offers. Cookies are also being used to enable the User to move around the Platform and to provide certain features. Another use of cookies is to secure a safe visit on the Platform. They also help us to optimize a visit to the Platform from the User.

3. Which information is being collected?

Cookies may include clicking on particular buttons, logging in or a record of which pages were visited by the User. This cookie policy is in accordance with the Belgian law (Belgian Act of 10/07/2012 laying down provisions on electronic communications, BS 20/9/2012).

4. Which types of cookies are being used?

Name	Category of use	Description	Example
Strictly necessary cookies	Security Processes	These cookies are strictly necessary to enable the User to move around the Platform or to provide certain requested features	
Tracking cookies	Preferences	These cookies outlast User sessions. If a persistent cookie has its max-age set to 1 year, then, within that year the initial value set in that cookie will be sent back to the server every time you visit the server. This is used to record a vital piece of information such as how a User initially came to the Platform.	Preferred language: once the User has selected his preferred language the persistent cookie will ensure that once revisiting the Platform, the content is delivered in the preferred language of the User.
Performance cookies	Analytics	These cookies help to improve the performance of the Platform, providing a better User experience.	Google Analytics helps Kowo to analyze how Users use the Platform. It registers the number of Users and tell things about their behavior overall, such as the typical length of a visit or the average number of pages a User views.
	Authentication, Security, and Compliance	Intended to prevent fraud, protect your data from unauthorized parties, and comply with legal requirements	or example, we use Cookies to determine if you are logged in.

5. Managing cookies in your browser

Some people prefer not to allow cookies. That's why browsers give the ability to manage cookies. Please visit the websites of the different browsers to learn how to block the storage of cookies. It is also possible to delete current installed cookies on your computer.

6. Changes in the Cookie Policy

KOWO may update this policy from time to time by publishing a new version on the Platform. It is recommended that User checks the Cookie Policy regularly.



Privacy Policy

The following Privacy Policy governs the processing of personal data by KOWO BVBA/SPRL, with registered offices at 1050 Brussels, Avenue Emile de Béco 83, a company listed in the Belgian Trade and Companies Register under number 0662.515.146 (hereafter “KOWO” or “we”).

1. General provisions

The purpose of this Privacy Policy is to specify which categories of personal data KOWO collects through its business activities and its website (www.kowo.io), subdomains and/or folders, applications, services and any other means relating to information or communication, including emails (collectively referred to as “Platform”). It also describes how such data may be processed and disclosed to others. The Privacy Policy further sets out the different measures KOWO has implemented to safeguard the security and confidentiality of the personal data it collects.

KOWO cares about the privacy of the Users of its Platform , and all others whose personal data may be collected (hereafter “User” or “you” or “your”) and will only collect and process personal data in accordance with the provisions of this Privacy Policy.

KOWO is to be considered as the controller of the personal data and will act in accordance with the provisions of all applicable privacy legislation, among which, the Belgian Act of 8 December 1992 on the protection of privacy in relation to the processing of personal data as modified by the Act of December 11th, 1998 and the Act of June 13th 2005 on the electronic communication and as further specified in this Privacy Policy as well as in compliance with the General Data Protection Regulation (Regulation (EU) 2016/679) as from its application.

Should you have any questions about this Privacy Policy or the feeling that your interests are not or inadequately represented, you can contact us via email: privacy@kowo.io.

Each User has the right to file a complaint with the Data Protection Authority (<https://www.privacycommission.be/nl/contact>). We would appreciate it however that, prior to filing any complaint, you contact us in order for us to assist you with your request or concern.

KOWO may change this Privacy Policy from time to time. But when we do, we'll let you know one way or another. Sometimes, we'll let you know by revising the date at the top of the Privacy Policy that's available on our website and mobile application. Other times, we may provide you with additional notice (such as adding a statement to our websites' homepages or providing you with an in-app notification).

Please note that the Platform may contain links to other websites digital platforms or Internet resources which may collect personal data voluntarily or through cookies or other technologies. KOWO has no responsibility, liability for, or control over those other websites or

Internet resources or their collection, use and disclosure of your personal data. KOWO recommends you to review the privacy policies of those other websites and Internet resources to understand how they collect and use personal data.

Terms used in the present Privacy Policy in capital letters are to be understood as defined in the Terms of Service.

User

2. Data processed by KOWO

The categories of personal data which can be processed while using the Platform or while communicating with KOWO can be divided in 2 basic categories:

- (a) Information you choose to give to KOWO;
- (b) Information KOWO gets when you use our Services.

2.1. Information you choose to give to KOWO

When you interact with our Services, we collect the information that you choose to share with us. For example, most of our services require you to set up an Account, so we need to collect a few important details about you, such as: a unique username, a password, your name and surname, a professional email address, a phone number, your date of birth, your home and work address, ...

When using the Application and in order to facilitate for Passengers to identify the Driver(s), we may also ask Drivers to provide us with the brand and color of their car as well as the license plate number.

Of course, you'll also provide us whatever information you send through the Services, such as chats between the Passengers and Drivers.

Finally, when you contact or communicate with us in any other way, we'll collect whatever information you volunteer.

2.2. Information KOWO gets when you use our Services

When you use our Services, we collect information about which of those services you've used and how you've used them. Here's a fuller explanation of the types of information we collect when you use our services:

- Usage Information. We collect information about your activity through our Services. For example, we may collect information about:
 - how you interact with the Services, such as whether you use the Service as a Passenger or Driver, the number of kilometers, the number of cancellations, ...

- how you communicate with other Users, such as their names, the time and date of your communications, the number of messages you exchange, ...
- **Device Information.** We collect information from and about the devices you use. For example, we collect:
 - information about your hardware and software, such as the hardware model, operating system version, device memory, unique application identifiers, apps installed, unique device identifiers, browser type, language, battery level, and time zone;
 - information about your wireless and mobile network connections, such as mobile phone number, service provider, and signal strength.
- **Location Information.** When you use our services we may collect information about your location. With your consent, we may also collect information about your precise location using methods that include GPS, wireless networks, cell towers and Wi-Fi access points.
- **Information Collected by Cookies and Other Technologies.** Like most online services and mobile applications, we may use cookies and other technologies, such as web beacons, web storage, and unique advertising identifiers, to collect information about your activity, browser, and device. To learn more about how we use cookies and your choices, please check out our [Cookie Policy](#).
- **Log Information.** We also collect log information when you use our website. That information includes, among other things:
 - details about how you've used our services.
 - device information, such as your web browser type and language.
 - access times.
 - pages viewed.
 - IP address.
 - identifiers associated with cookies or other technologies that may uniquely identify your device or browser.
 - pages you visited before or after navigating to our website.

The processing of these personal data are necessary for the performance of the contract to which Corporate Clients and Users are party. KOWO shall not be able to provide the Services in absence of the concerning personal data.

Users can't disclose personal data to KOWO about another person unless this person has consented to this in accordance with this Privacy Policy.

KOWO will not collect any sensitive data. This includes data such as: data relating to race or ethnic origin, religious beliefs, criminal record, physical or mental health, or sexual orientation from Users. KOWO will, if necessary, obtain your explicit consent to collect such data.

The User undertakes to provide correct and up-to-date personal data to KOWO. It will be entitled to change at all times its personal information via its Account. KOWO cannot be held liable for any failure in its Services due to incorrect personal data provided by the User.

3. Purpose of the processing

KOWO acts as the controller for the processing of personal data and will process these data for the following purposes:

- User administration
- develop, operate, improve, deliver, maintain, and protect our products and services;
- send you push-notifications as described in the Terms of Service
- send you communications, including by email. For example, we may use email to respond to support inquiries or to share information about our products, services, and promotional offers that we think may interest you.
- monitor and analyse usage.
- enhance the safety and security of our products and services.
- verify your identity and prevent fraud or other unauthorized or illegal activity.
- use information we've collected from cookies and other technology to enhance the services and your experience with them.
- enforce our Terms of Service and other usage policies.

KOWO will ensure that for its marketing activities it will comply with the applicable legislation and that it will obtain, where required, the necessary consents before the User receives any emails or other electronic communication from KOWO or one of its partners. You can demand at any time to stop the sending of such information by clicking on the unsubscribe button in the received electronic communication.

4. The User's rights

Users have the right, free of charges, to access, modify, correct and and - in some cases – to limit the processing or to delete their personal data. They have also a right to data portability, which implies that KOWO can supply (at their request) their data to them and / or to a third party in a structured and machine-readable form. Participants can exercise their rights either directly through their Account or by sending an email to privacy@kowo.io.

In case the processing is based on consent, the User will be entitled to revoke its consent at any time.

The personal data can be transmitted to third parties within the limits and conditions as set out under section 5 of this Privacy Policy, except in case of an opposition hereto.

5. Disclosure of personal data

Although KOWO may transfer personal data to so-called service providers who process data in its name, KOWO will not share data with third parties for secondary or unrelated purposes unless otherwise stated when collecting these data. KOWO will however share your personal data with its Corporate Clients, AXA Assistance and other Users (in case of a Match) in order to comply with the obligations set out under the Terms of Service.

If KOWO gets involved in a merger, asset sale, financing, liquidation or bankruptcy, or acquisition of all or some portion of our business to another company, we may share your information with that company before and after the transaction closes.

Where appropriate or required, KOWO will be entitled to transmit personal data to law enforcement authorities, regulatory or other government agencies, or third parties where necessary or desirable to comply with legal or regulatory obligations or in the context of the above-mentioned purposes.

6. Retention period

KOWO does not store the data longer than legally admissible and in any case not longer than required for the purposes mentioned in section 3.

7. International data transfers

KOWO will not transfer any personal data to countries which do not have data protection laws equivalent to those in force in the European Economic Area.

8. Security of data

KOWO shall take all reasonable and appropriate technical and organisational measures to protect the security, confidentiality and integrity of personal data. In particular, KOWO will take appropriate measures to prevent any accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

However, each User recognizes that the disclosure of personal data via the internet is not without any risks. The User consequently acknowledges that KOWO cannot be held accountable or liable for any potential direct and indirect damage he/she would suffer as a consequence of an illegal or illegitimate use of his/her data by third parties who do not have the authorization to use these data.

However, KOWO reminds you that you should take all appropriate measures to ensure the security of your devices, personal data or software against any possible computer viruses.

9. Registration with the supervisory authority

KOWO has registered its business activities as a data controller with the Belgian Privacy Commission.

This declaration can be consulted in the public register on the following website: www.privacycommission.be.

10. Competent Court and Applicable Law

This Privacy Policy shall be governed by - and construed in accordance with - the Belgian legislation.

The competent courts for disputes regarding this Privacy Policy will be the courts of Brussels, unless otherwise imposed by mandatory statutory provisions.