

Privacy Policy for Driver and passenger In Ethiopia

Privacy Notice pursuant to Ethiopian General Data Protection Regulation for Users of the Halal Driver & Passenger App

Version: August, 2021

The information provided below gives you an overview over the processing of your personal data by us and your rights under data protection law in connection with the use of our app for procuring Journeys for Drivers & Passengers (“Halal Driver App & Halal Passenger App”).

Which personal data is processed is substantively determined based on the services or products you use.

1. Information regarding the Data Controller

For both Drivers & Passengers in the territory of Ethiopia, the data controller as per Ethiopian law is:

Halal Taxi plc (“HalalTaxi”) which is a private limited company established under the civil code of the Federal Democratic Republic of Ethiopia.

Halal Taxi plc

Meskel Flower

Addis Ababa

Ethiopia

2. Definitions

“*Personal Data*” is all information which relates to an identified or identifiable natural person. Among these are, for example, name, postal address, e-mail address or telephone number, gender, nationality, but also usage data like your IP address.

“*Processing*” is every process carried out with or without automated assistance or every sequence of such processes in connection with personal data, e.g. obtaining, capturing, organizing, ordering, saving, adjusting or modifying, sorting, accessing, using, disclosing by transmission, distributing or any other form of making available, comparing or connecting, limiting, deleting or destroying.

“*HalalGroup*” consists of Halal Passenger, Halal Driver and all apps that will be developed and owned by the Data controller or Halal Taxi plc.

3. Data Processing Activities and Purposes

In the following, we will inform you about the various types of personal data we process and for what purpose. Halal Driver App makes it possible for you to procure Journeys through us with Passengers. For the use of our Halal Driver App for procurement of Journeys, you must provide personal data which we process in order to perform the respective service. Personal data include but not limited to First Name, Middle Name, Surname, mobile phone no, driver photo, gender, email(optional), driver license No, vehicle registration, trade license, third party insurance, vehicle plate no, color and make of vehicle. if additional information can be voluntarily shared, these are indicated as being “optional“.

3.1. Journey Procurement

To procure journeys through us, the following personal data is processed:

3.1.1. General

During the registration via the HALAL TAXI Driver App we will process the following information:

First Name, Middle Name, Surname, mobile phone no, driver photo, gender, email(optional), driver license No, vehicle registration, trade license, third party insurance, vehicle plate no, color and make of the vehicle, information regarding your license, your GPS coordinates while being logged in to the HALAL TAXI Driver App and the same at time of booking, at the start, during the course of and at the destination of a particular Journey, information regarding your end user device (Device ID, time of access of the HALAL TAXI Driver App, browser type and operating system), information regarding the Transportation Company (for Drivers who are employees), company address (for Drivers who are, at the same time, sole proprietors), statements regarding ratings by Passengers (1 to 5 stars for the Driver and the vehicle as well as the average rating), license plate number, color and make of the vehicle, readiness status, Driver ID, number of Journeys, revenue, rate of concluding or breaking off Journeys, statements regarding payment by the Passenger including tips and, in encrypted form, the password you have selected, profile picture (optional input).

You can consent to the usage of your GPS coordinates by HALAL TAXI during the installation of the HALAL TAXI Driver App. Via the operating system of your end user device (smartphone, tablet, etc.), you can also consent to the usage of your GPS coordinates by HALAL TAXI at a later point in time or withdraw your consent. In the absence of you sharing your GPS coordinates with us, we cannot procure Journeys for you or, as it may be, for your Transportation Company, since we communicate Passenger requests based on location in order to arrive at a short time delay until arrival.

For purposes of identification, we show your GPS coordinates as well as your name and, insofar as it has been provided to us, your profile picture and the license plate number to the Passenger who has booked a Journey with you. After accepting the Journey, during the Journey and for a certain period of time after the conclusion of the Journey, the Passenger is able to call you via the HALAL TAXI Passenger App. For this, the mobile phone number you provided during registration will be shown. This is necessary so that the Passenger can call you after a Journey in order to ask, for example, about items forgotten in the vehicle.

Without the processing of the foregoing personal data, we cannot procure any Journeys for you through your Transportation Company. This does not apply to optional inputs.

3.1.2. Integration of Google Maps

The HALAL TAXI Driver & Passengers App uses the Google Maps API. In this way, you can be shown maps in the HALAL TAXI Driver & Passengers App and you can also have the ability to interact with said maps which represents a legitimate interest on our Part). Without the Google Maps API application, HALAL TAXI Driver & Passengers App will not function. The terms of use for Google Maps can be found at: https://www.google.com/help/terms_maps.html. There, you will also find a notice regarding the privacy policy of Google at <https://policies.google.com/privacy?hl=en>. We use Google Maps in order to calculate the anticipated cost of the Journey and in order to interactively show you the distance to the Passenger who booked the Journey. We process your GPS coordinates for our legitimate interests , if you have agreed to the usage. Your GPS coordinates will only be transmitted to Google in an anonymized manner. Personally identifying you is impossible.

3.2. Payment and Fee Collection

In order to make it possible to conduct payment pursuant to the HALAL TAXI General Terms and Conditions, the following personal data will be processed pursuant to Ethiopian law for the purpose of performance of the contract:

Your first name, father name, surname, the number of Journeys, revenue, wallet amount and, if you are yourself a Transportation Company, information regarding payments and bank account.

The same data will be used for the service charges or commission fee paid by the drivers for halal taxi. The commission amount drivers pay for halal taxi is either based on a percentage deducted from driver revenue or a fixed amount which will be set by halal taxi plc. In either case, Drivers are expected to deposit a fixed amount Set by the company and recorded as wallet amount. The system will automatically deduct from this amount in the driver record.

3.3. Rating of Drivers and Passengers

Via the HALAL TAXI Passenger App, Passengers can rate you and your vehicle after a Journey with between 1 to 5 stars. The individual rating flows into the average value which we have determined for you and your vehicle. The individual rating is only visible to the respective Passenger who provides it, to you as the Driver and to HALAL TAXI. For Drivers who are employed with a Transportation Company, we only transmit the individual rating to your Transportation Company with your consent.

Further, Passengers can add Drivers as favorite Drivers in their HALAL TAXI Passenger App profiles. In this context, your first name and middle name, your rating and the profile picture will be saved in the HALAL TAXI Passenger App of the respective Passenger.

The processing of this data takes place on the basis of our legitimate interest Pursuant to Ethiopian law to ensure a reasonable standard of quality and ensure Passenger security.

Beyond this, you have the possibility of rating Passengers. The ratings are only visible to HALAL TAXI and will only be transmitted to the affected Passenger upon request in an anonymized form. The processing of personal data by HALAL TAXI will take place on the basis of your consent.

3.4. Fraud Prevention

3.4.1. General

HALAL TAXI will use a local service provider to predict patterns of fraudulent behavior. The personal data used to identify the pattern are the following:

Driver ID, First name, Middle(Father) name, and surname, date of birth, city, country, e-mail address, mobile phone number, information regarding your driver license, vehicle registration, third party insurance, trade license, email address, home address, device ID, IDFA (Advertising ID), current status.

Based on the calculated score we are able to prioritize the dispatched journeys accordingly. This ensures a fair and risk minimized dispatch. Our legitimate interest to prevent fraud is based on Ethiopian Law.

3.4.2. GPS Tracking

In order to prevent fraudulent behavior, we save the GPS coordinates transmitted by your mobile phone in short intervals during a Journey which, thus, makes it possible for us to depict the entire course of a Journey. By doing this we wish to ensure that Drivers do not intentionally prolong the Journey in order to obtain a higher compensation. At the same time, we can correct unjustified Passenger complaints by presenting the actual course of a Journey. The processing of your GPS coordinates takes place during the course of a Journey for your own protection as well as for the protection of the Passenger as well as for our own protection.

3.5. Bug Fixing and Functionality Improvements

In order to fix bugs in the HALAL TAXI Driver App and to improve functionality of the HALAL TAXI Driver App and to adjust it to suit the needs of Drivers, we process the following personal data on the basis of our legitimate interest:

First name, Middle(Father) name, and surname, date of birth, city, country, e-mail address, mobile phone number, information regarding your driver license, vehicle registration, third party insurance, trade license, your GPS coordinates while being logged into the HALAL TAXI Driver App and at the time of booking, time of starting and during the course and at the destination of a particular Journey, information regarding your end user device (Device ID, time of access of the HALAL TAXI Driver App, browser type and operating system), information regarding the rating of Passengers (1 to 5 stars for the Driver and the vehicle as well as the average rating), license plate, color and make of the vehicle, readiness status, Driver ID, number of Journeys, revenue, rate of concluding or breaking off or canceling Journeys, statements regarding payment by the Passenger including tips and, in encrypted form, the password you have selected.

Inasmuch as it is sufficient for the performance of the respective purpose, we work with anonymous data and not with personal data.

3.6. News & Personalized Offers

3.6.1. General

If, in the context of the registration process or later in the profile of the HALAL TAXI Driver & Passengers App under the rubric "Privacy", consent is given to receive news & personalized offers (advertising, coupons and special offers) and to show usage-based advertising ("Retargeting"), and the correspondingly placed toggle has been activated, you will receive offers and advertising from us, and also for products and services of other companies of the HALAL TAXI Group. In this respect, your end user device (smartphone, tablet,

PC, etc.) will receive personalized advertisements via electronic post (e-mail, SMS, MMS) or by another electronic means (via in-app messages, push messages).

In connection with this, we process the following personal data, insofar as you have given us the corresponding consent:

First name, Middle(Father) name, surname, driver ID, e-mail address, business address, mobile phone number, profile picture, registration data, language setting, type of Journey (booking, try-out ride), version of the HALAL TAXI Driver App, login information, your GPS location data at the time of the booking and at the time of the end of the Journey or, as it may be, the pickup and destination locations, device ID (device identifier), IDFA (advertising identifier Apple Identifier for Advertisers), IFV (advertising identifier, Identifier Vendor), GAID (Google Advertising Identifier), IP address and usage data (usage frequency, information relating to the downloading of the HALAL TAXI Driver App, status of the registration of Journeys), language, time zone and city.

If you do not wish to be contacted in this regard, you can – just as easily as you gave consent – declare your withdrawal by calling us on 9700. Of course, you can also contact us via our Official website www.halalmetertaxi.com

Please note that the withdrawal and ensuing changes are valid only for the future and will be effective or, as it may be, implemented by no later than 10 days or 240 hours from the withdrawal. This is for reasons of a technical nature, which do not permit faster implementation. In case of withdrawal, we reserve the right to process your personal data in anonymous form for internal analysis purposes.

3.6.2. Direct Advertising for Existing Customers and Drivers

If, in connection with the performance of our procurement services, we have received your e-mail address or mobile phone number and you have completed at least one Journey which we procured, we will use these exclusively for our own direct advertising of our own products and services via electronic post (e-mail, SMS and MMS), unless you have rejected such direct advertising. To this purpose, on the basis of our legitimate interest, we process the following data: e-mail address and mobile phone number. Our legitimate interest lies in intensifying customer relationships by proposing appropriate and interesting product information. The objection to direct advertising is possible at any time with effect for the future by clicking on the corresponding link in a relevant e-mail (e.g. to unsubscribe to a newsletter) or by contact via SMS. The direct advertisement sent by us is not personalized. Please take into account that the objection and the modifications required thereby are valid only for the future and will be effective or, as it may be, implemented by no later than 240 hours from withdrawal. This is for reasons of a technical nature, which do not permit faster implementation.

3.6.3. Sending of news and service communications

For sending news and offer e-mails, we will make use of the third party service provider.

We have concluded a data processing agreement with our service providers which ensures that the service provider exclusively processes your personal data pursuant to our instructions and in accordance with current data protection law. The third party service provider will guarantee that the processing of personal data is subject to an adequate protection level vis-a-vis the processing of data, in that the requirements of Ethiopian

data protection law will be adhered to. In addition, we will conclude standard contractual clauses with the third party service provider to ensure an adequate level of data protection when processing your data. The legal basis for the transmission of data and its processing by our service providers. Our legitimate interest in the engaging of these service providers lies in the professional and reasonable organization of automated processes in an economically sensible way which makes it possible to provide you a positive user experience.

3.6.4. Facebook Custom Audiences

In order to be able to display individually targeted advertisements about our services within the Facebook social network, a service of Facebook, we work with Facebook Custom Audiences. We do this so that advertisements (e.g. banners) can be tailored exactly to the possible needs of the customer. The basis of this is a marking process. In this context, the so called advertising identifier (IDFA or GAID) from the customer's end user device (e.g. smartphone) is sent automatically or manually, using a service provider selected by HALAL TAXI, to Facebook via a certain interface. The advertising identifiers are individual, but not personalized and not permanent identification numbers for a certain end user device which are provided by iOS or, as it may be, Android. You can prevent the transmission of advertising identifiers if, in iOS under "Settings" – "Data Protection (or Privacy)" – "Advertising", you select the option "no ad tracking" or, as it may be, for Android, under "Settings" – "Google" – "Advertising" select the option "deactivate personalized advertising." Further, you have the option to delete the advertising identifier at any time in the device settings (iOS: "Reset Ad-ID"; Android: "Reset Advertising-ID"). Then, a new identification number will be generated for your device which will not be aggregated with the previously obtained data for your device. After the transmission of the advertising identifiers, HALAL TAXI will prepare a list of customers who have performed certain actions using the HALAL TAXI Driver & Passengers App. In this context, certain pre-defined actions can be selected (e.g. installation of the HALAL TAXI Driver & Passengers App in the previous 30 days). Facebook compares the advertising identifier of the customer with the advertising identifier of individuals with a Facebook profile, defines certain groups (e.g. Group 1: Installation in the previous 30 days) and then shows appropriate ads to this group. Facebook can also use the data to select other Facebook users whose statistical behaviors are similar to those of our customers or app users (so called statistical twins, called Lookalike Audience by Facebook). In this way, our advertising can reach individuals who are not yet using our services but who, with a high likelihood, would be interested in doing so. Customers who are not, at the same time, Facebook users, cannot however be compared by Facebook and they are not shown any advertisements. Furthermore, conditioned upon your consent, we can manually transmit your e-mail address in an encrypted form to Facebook (so called hash procedure). Facebook then compares whether the transmitted e-mail address corresponds with existing Facebook customers. If there is a correspondence, then these target groups will be shown targeted advertisements/campaigns by HALAL TAXI on Facebook or on partner websites of Facebook. In connection with Facebook Custom Audiences, we process the following data pursuant to Art. 6 (1) a) GDPR: web identifier (IDFA for Apple or GAID for Google) and the e-mail address.

If you no longer wish for your data to be processed in connection with Facebook Custom Audiences, you can – just as easily as when you gave consent – withdraw your consent by calling us on 9700 or send us a message via our official website www.halalmetertaxi.com.

Please note that the withdrawal and the there upon ensuing changes are valid for the future and will be effective or, as it may be, implemented by no later than 10days/ 240 hours from the withdrawal. This is for reasons of a technical nature, which do not permit faster implementation.

3.6.5. Mobile Attribution Tracking

We will make use of the service providers Pinterest, Snapchat, Twitter or any legal party to deploy marketing campaigns according to demand, further optimize them and measure their reach. In this way, we ensure that the respective marketing campaigns are only displayed to users who have also shown an interest in our HALAL TAXI offers and that our marketing campaigns therefore correspond to the potential interest of the respective user. In addition, we can track the behavior of users after they have clicked on one of our HALAL TAXI marketing campaigns. This helps us measure the reach of each campaign for statistical, market-related and internal billing purposes.

The following data will be processed:

Device information (e.g. type, brand), Advertising Identifiers (IDFA), operating system used, IP address, timestamp of the call to our offer, type and content of the campaign and the click behavior in relation to a campaign.

The processing is carried out on the basis of legitimate interests for behavior- and interest-based advertising.

3.7. Studies & Surveys

If you have consented in the course of the registration process or, later, in the profile of the HALAL TAXI Driver & Passengers App under “Data Protection“, to receive studies & surveys, and have activated the corresponding toggle, we will contact you after a Journey or at some other time in the context of personalized (sent only to you and based on an analysis of the HALAL TAXI Driver & Passengers App usage frequency) studies & surveys sent by electronic post (e-mail, SMS, MMS) or otherwise electronically (in-app messages, push messages) and request your participation. For example, we carry out quest campaigns at regular intervals, with the help of which we aim to increase and optimize the tours we arrange. In studies and surveys, the following personal data may be processed by us with your consent:

First name, middle(Father) name, surname, Driver ID, e-mail address, business address, mobile phone number, profile picture), method of payment, registration data, language set, HALAL TAXI Driver App profile (corporate or private customer), type of Journey (booking, try-out ride), HALAL TAXI Driver & Passengers App version, login information (user name), your GPS coordinates at the time of booking and at the end of the Journey and usage data (usage frequency, information regarding the download of the HALAL TAXI Driver & Passengers App, status of registrations or Journey), registration data, date of last login, push tokens, Device ID (device identifier), IDFA (advertising identifier, Apple Identifier for Advertisers), IFV (advertising identifier, Identifier Vendor), GAID (Google Advertising Identifier) and IP address

If you do not wish to be contacted in this regard, you can – just as easily as you gave consent – declare your withdrawal by calling us on 9700. Of course, you can also contact us via our Official website www.halaltaximeter.com

Please note that the withdrawal and ensuing changes are valid only for the future and will be effective or, as it may be, implemented by no later than 10 days or 240 hours from the withdrawal. This is for reasons of a technical nature, which do not permit faster implementation. In case of withdrawal, we reserve the right to process your personal data in anonymous form for internal analysis purposes.

3.8. Social Media Presences

3.8.1. Facebook

When entering our Facebook-page (via a link on our website, in our newsletter or directly) you reach the technical platform provided by Facebook.

We would like to inform you that you use the Facebook-page and its functions on your own responsibility. This especially applies for the use of the interactive functions (e.g. comments, sharing, rating).

During you visit on our Facebook-page, HALAL TAXI basically processes personal data only if you interact with us via the page, e.g. when leaving a comment, press a like-button or sending us a message. The legal basis for this processing depends on the way you use the page. Moreover, your data can be processed with your consent when you like or comment one of our posts or provide content on our page yourself. You can withdraw your consent any time with future effect by deleting the comment or your “regarding” content. The revocation does not affect the legitimate consent-based processing that was performed until the revocation.

Additionally, we analyze the visits and interactions on our page. For this Facebook creates usage profiles and provides the data in form of page-insights (“page-insights”). Page-insights are summarized data that allows us to get an overview on how users interact with our Facebook-page. For further information please visit: <https://www.facebook.com/help/pages/insights>.

Please mind that your personal data is not only processed by HALAL TAXI, but also by Facebook while using and interacting with our Facebook-page.

HALAL TAXI and Facebook are jointly responsible for the processing of insight-data. The respective responsibilities for HALAL TAXI and Facebook regarding the processing of insight-data are available in the page insights addendum: https://www.facebook.com/legal/terms/page_controller_addendum.

How Facebook uses insight-data for its own purposes, to what extent insight data can be matched with certain users, for how long this data is stored and if data resulting from your visit on a Facebook-page is handed over to third parties is solely the responsibility of Facebook.

Regarding the data processing via our Facebook-page, you can not only assert your rights under the GDPR (for further information see section 5 “Your Rights” of this document) towards HALAL TAXI, but also towards Facebook. Further details can be found in Facebook’s data policy under: <https://www.facebook.com/about/privacy>.

Additional to the before-mentioned processing activities, Facebook also processes your data for analysis and advertising purposes, respectively to display personalized advertisements. According to our knowledge, Facebook makes use of cookies, pixels and other techniques which process your usage behaviour (even across different devices. This enables Facebook to display target-oriented advertisements on its own platforms and third-party websites, as well. The data collected about you in this context are transmitted to the United States of America and other non-EU countries. Which exact information Facebook receives and how it is used, is generally described in Facebook’s privacy policy. There you will also find ways to contact Facebook directly and information on settings for advertisements. The privacy policy is available under <https://www.facebook.com/about/privacy>.

The complete privacy policy can be found here: https://www.facebook.com/full_data_use_policy

Furthermore, Facebook offers its users the possibility to object to certain processing activities. More information on this and opt-out-possibilities can be found here: <https://www.facebook.com/settings?tab=ads>.

3.8.2. Links to the social networks Instagram, Twitter, LinkedIn, YouTube

On our website and in our newsletters we link our accounts on other social media platforms Instagram, LinkedIn; Twitter (), YouTube via the icon of the respective social network.

When you click the links or visit our pages on the platform directly, you are on the website of the respective social media platform. The general terms and conditions and privacy policies of the respective social media network provider.

We would like to inform you that we do not receive any information about the content and extent of the data processing performed by the social media network. Information on how the respective social media platform handles your data can be found in the following privacy policies:

1. for Instagram under <http://instagram.com/about/legal/privacy/>
2. for LinkedIn under <https://www.linkedin.com/legal/privacy-policy>
- 3.
4. for Twitter under: <https://twitter.com/en/privacy> and <https://help.twitter.com/en/rules-and-policies/twitter-cookies>
5. for YouTube: <https://policies.google.com/privacy?hl=en>

We process personal data on our social media pages as far as the user interacts with us directly, by commenting or liking our posts or sending messages. Legal basis for this kind processing is the users' consent. The processing is performed due to a legitimate interest in public relations and communications.

4. Data Exchange within the HALAL TAXI Group and Al-Foz plc

For internal administration and standardization purposes, we may transfer personal data of drivers or passengers within the HALAL TAXI Group and Al-Foz plc. The legal basis for this is our legitimate interest in effective company management.

4.1. Joint Controller Agreement

HALAL TAXI has not entered into a Joint Controller Agreement according to GDPR with Al-Foz. The Parties have jointly determined the order of the processing of your personal data in each section of processing.

The purpose of this agreement is to further enhance the development of the HALAL TAXI App, to improve our service level, to improve the processing of customer enquiries and to improve the handling of drivers' & 'Passengers' personal data. The Parties jointly agreed on which obligations each party fulfils under the GDPR.

Al-Foz is processing jointly the drivers' & Passengers personal data of the journeys procured via the HALAL TAXI App listed under point 3.1 of all the local entities of the HALAL TAXI Group to improve the software of the HALAL TAXI Driver & Passengers App and provide technical know-how to the local entities. HALAL TAXI is responsible for all data processing with regard to the local usage of the Halal Driver & Passengers App.

Despite the existence of a joint controllership, the Parties fulfil the obligations under data protection law in accordance with their respective competences.

5. Processing in-/outside of the Ethiopia

In part, we arrange for external service providers to process your data (e.g. troubleshooting, creation of mailings). To this end it is necessary for us to transmit your personal data to our external service providers for a specified purpose (confined to the purpose in question). We have selected our service providers carefully and engaged them in writing. They are bound by our instructions and we have obtained information about their technical and organizational measures for the secure processing of personal data. We also require that our service providers comply with the applicable data protection regulations.

We store all our data with a Server and cloud service provider within the EU, USA, Africa, Asia or in IT infrastructures and systems (employee computers) at our sites within Ethiopia.

We do not sell any personal data to third parties.

However, we do reserve the right to disclose information about you if we are legally obligated to do so or if we are asked to surrender it by administrative or law enforcement bodies (e.g. police or prosecutors).

6. Your Rights

You have the right to obtain confirmation as to whether or not personal data concerning you is being processed by us. Where this is the case, we will be pleased to give you access to the personal data.

In order to assert your rights against us, it is sufficient to send a message via <https://support.free-now.com/hc/en-ie/requests/new> or a postal letter to the address mentioned under “1. Information regarding the Data Controller”.

In addition, you may at any time lodge a complaint with a competent supervisory authority if you consider that the processing of your personal data infringes data protection regulations.

7. Data Security

We have taken appropriate technical and organizational measures to guarantee data security, in particular to protect your personal data against access by third parties, as well as accidental or intentional modification, loss or destruction. Such measures are reviewed periodically and adapted in line with the state of the art. The transfer of your personal data from your end user device (e.g. smartphone) to us is always encrypted.

8. Storage Period

The data provided by you to us is only stored for as long as is required to perform the respective purpose for which you have transmitted your data, or inasmuch as it is required for conformity with statutory or official requirements. Personal data is anonymized by us, in principle, after five years, unless we have a legitimate interest in a longer storage period (e.g. bookkeeping requirements).

9. Updates and Changes

We retain the right to modify this privacy policy at any time in the future in accordance with the applicable data protection regulations.