ITACO PLATFORM

PRIVACY POLICY

Last updated: 25th May 2021

PLEASE REVIEW THE FOLLOWING CAREFULLY SO THAT YOU UNDERSTAND AND AGREE TO THIS PRIVACY POLICY PRACTICES BEFORE DOWNLOADING ITACO APPLICATIONS AND/OR USING OUR WEBSITE AND/OR SERVICES.

Because ITACO Bahrain Co W.L.L. ("ITACO", the "Company", "we", or "us") gathers information from ITACO Platform Existing Customers, ITACO Platform Guests and ITACO Service Providers ("User", "You") of its www.itaco-tpa.com, <a href="htt

The Privacy Policy covers all aspects of ITACO Platform whether "online" (e.g., the www.itaco-tpa.com and/or www.itacoproviders.com) or "mobile applications" (e.g., ITACO Assist and/or ITACO Providers), however accessed and/or used, whether via personal computers, mobile devices or otherwise) and "offline" (e.g., collection of data through mailings, telephone, or in person interactions) activities owned, operated, provided, or made available by ITACO.

This Privacy Policy also applies to your use of interactive features or downloads that: (i) we own or control; (ii) are available through ITACO Platform; or (iii) interact with ITACO Platform and post or incorporate this Privacy Policy.

In addition, please review our Terms and Conditions, which may apply to your use of ITACO Platform. This Privacy Policy is incorporated by reference into the applicable Terms and Conditions.

If you have questions about this Privacy Policy, please contact us at info@itaco-tpa.com

IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, THEN YOU MUST IMMEDIATELY EXIT ITACO PLATFORM AND NOT IN ANY CIRCUMSTANCES CONTINUE WITH ANY OF ITACO PLATFORM OR SERVICES AND TO NOT GIVE US ANY OF YOUR INFORMATION.

BY USING OUR ITACO PLATFORM OR BY OTHERWISE GIVING US YOUR INFORMATION, YOU AGREE TO THE TERMS OF THIS PRIVACY POLICY.

1. ITACO's Collection of Information.

(a) Collection of Users Personal Information.

As part of ITACO Platform requisites, we will ask you to provide us with certain categories of personal information, including but not limited to:

Name

Age

Gender

Nationality

ID number

Address

Email address

Password

Mobile Phone Number

Vehicle details for which you are requesting a Service (Make, Model, Year, Plate number, VIN, etc.)

Vehicle details with which you are providing a Service (Make, Model, Year, Plate number, VIN, equipment, etc) in case of ITACO Service Providers

P.O.Box

Bank account details

Credit Card Number, expiration date & security code and or information regarding your PayPal, Google Wallet or other digital payment accounts.

We may collect this information through various forms and in various places through ITACO Platform, including account registration forms, contact us forms, or when you otherwise interact with us, for example, when you sign up to use the Services, you create a user profile.

You also have the option to upload a photo when registering for ITACO Platform. You may remove or update the photo at any time by logging into your account. All of the foregoing (including your photo) shall be hereafter referred to as "Personal Information"). Any and all information including the Personal Information you share with us (including your photo if submitted) shall be viewable by and shared with Service Providers in connection with requests you submit for Services to verify your identity and bill your credit card account for the Services you order.

Besides the Personal Information, we may also collect other non-personally identifiable information in relation to your use of ITACO Platform. Certain features and aspect of ITACO Platform may require different types and forms of Personal Information.

You can opt out of providing Personal Information by not entering it or not using ITACO Platform, although not providing certain requested Personal Information may hinder your ability to use ITACO Platform, features or aspects of ITACO Platform.

(b) Collection & Use of Users Non-Personal Information.

In addition to Personal Information, we and our third-party service providers may use a variety of technologies that automatically (or passively) collect certain information whenever you visit or interact with ITACO Platform ("Usage Information"). This Usage Information may include the browser that you are using, the URL that referred you to ITACO Platform, all of the areas within ITACO Platform that you visit, and the time of day, among other information. We may use Usage Information for various reasons, including to enhance or otherwise improve ITACO Platform.

In addition, we collect your IP address or other unique identifier "Device Identifier") for your computer, mobile or other device used to access the Services (any, a "Device"). A Device Identifier is a number that is automatically assigned to your Device used to access ITACO Platform, and our computers identify your Device by its Device Identifier. Usage Information may be non-identifying or may be associated with you. Whenever we associate Usage Information or a Device Identifier with your Personal Information, we will treat it as Personal Information.

In addition, tracking information is collected as you navigate through our Services, including, but not limited to geographic areas. If you access ITACO Platform while traveling in a vehicle, your mobile phone will send your GPS coordinates to our servers. Most GPS enabled mobile devices can define one's location to within 50 feet.

With respect to geo-location data, we track through your Mobile Device, we use that geo-location information for various purposes such as;

- it enables ITACO to verify User location,
- it enables ITACO to know User's distance from ITACO Service Providers and vice versa,
- it enables ITACO to know User's distance from the nearest garage/repairer,
- it enables ITACO to provide Users with the Services cost estimation,
- it enables ITACO to provide customer support, send promotions and offers,
- it enables ITACO to enhance ITACO Platform, and for our internal business purposes.
- it enables Users and ITACO Service Providers (if you choose through any features we may provide) to share their information with other people.

ITACO will request User's permission to obtain your location via your mobile phone, so that Service can be provided.

You may at any time no longer allow our Mobile Application to use your location by turning this feature off at the Mobile Device level. Except as otherwise permitted in this Privacy Policy, we will not share this information with third parties for any purpose and will only use this information for the sole purpose of providing you with the ability to request Services via ITACO's Mobile Application.

A few of the methods that may be used to collect Usage Information include, without limitation, the following (and subsequent technology and methods hereafter developed):

A cookie is a data file placed on a Device when it is used to access ITACO Platform. A Flash cookie is a data file placed on a Device via the Adobe Flash plug-in that may be builtin to or downloaded by you to your Device. Cookies and Flash Cookies may be used for many purposes, including, without limitation, remembering you and your preferences and tracking your visits to our web pages. Cookies work by assigning a number to the user that has no meaning outside of the assigning website.

If you do not want information to be collected using cookies, your browser allows you to deny or accept the use of cookies. Cookies can be disabled or controlled by setting a preference within your web browser or on your Device. If you choose to disable cookies or Flash cookies on your Device, some features of the Services may not function properly or may not be able to customize the delivery of information to you.

You should be aware that the Company cannot control the use of cookies (or the resulting information) by third parties and/or the usage of cookies by any third parties.

Web Beacons.

Small graphic images or other web programming code called web beacons (also known as "1×1 GIFs" or "clear GIFs") may be included in our web and mobile pages and messages. The web beacons are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web Users. In contrast to cookies, which are stored in a user's computer hard drive, web beacons are embedded invisibly on Web pages and are about the size of the period at the end of this sentence. Web beacons or similar technologies help us better manage content on ITACO Platform by informing us what content is effective, count Users of ITACO Platform, monitor how Users navigate ITACO Platform, count how many e-mails that we send were opened or to count how many particular articles or links were actually viewed. We do not tie the information gathered by web beacons to our customers' personal information.

Embedded Scripts.

An embedded script is programming code that is designed to collect information about your interactions with ITACO Platform, such as the links you click on. The code is temporarily downloaded onto your Device from our web server or a third-party service provider, is active only while you are connected to ITACO Platform and is deactivated or deleted thereafter.

(c) Additional GPS Coordinates Collection in the background (applicable only to ITACO Service Providers).

This information is collected for the following purposes.

- it enables ITACO to connect Users and Service Providers in their vicinity and vice versa,
- it enables ITACO to deliver Service Providers relevant job offers based on their location,
- it enables ITACO the ability to provide Users with timely and accurate ETA's of ITACO Service Providers,
- it enables ITACO the ability to provide ITACO Service Providers with timely and accurate ETA's to reach Users,
- it enables ITACO the ability to provide Users and ITACO Service Provider with timely and accurate ETA's to reach garage/repairer,

ITACO will request ITACO Service Providers permission to obtain location via your mobile phone, so that service can be provided efficiently.

You may at any time no longer allow our Mobile Applications to use your location by turning this feature off at the Mobile Device level. Except as otherwise permitted in this Privacy Policy, we will not share this information with third parties for any purpose and will only use this information for the sole purpose of providing you with the ability to receive Services requests via ITACO's Mobile Application.

You always have the option of not providing your GPS location in ITACO Providers mobile app permissions.

User Information from Third Parties.

We may, from time to time, supplement the information we collect from or about you through ITACO Platform with outside records from third parties in order to enhance our ability to serve you, to tailor our content to you and to offer you opportunities to purchase products or Services that we believe may be of interest to you. We may combine the information we receive from those sources with information we collect through ITACO Platform. In those cases, we will apply this Privacy Policy to any Personal Information received, unless we have mentioned otherwise.

User-Submitted Information to Third Parties.

If you choose to use our referral service to tell a friend about ITACO Platform or other ITACO-related activities (e.g. job openings), we will ask you for your friend's contact details which will also include your friend's name and email address. We will automatically send your friend a one-time email inviting him or her to visit ITACO Platform. We store this information for the sole purpose of sending this one-time email and tracking the success of our referral program, and do not use this information for any other marketing purpose unless we obtain consent from that person or we explicitly say otherwise. Please be aware that when you use any referral feature offered through ITACO Platform, your e-mail address may be included in the communication sent to your friend. If you or your friend would like us to remove this information from our database, please contact us via e-mail at privacy@itacorsa.com

Information Collected from Users by ITACO Mobile Applications.

ITACO Platform is primarily provided through the application on your mobile, tablet computer or similar device (the "Mobile Application"). You agree that we may collect and use technical data and related information, including but not limited to, technical information about your device, system and application software, and peripherals, that is gathered periodically to facilitate the provision of software updates, product support and other Services to you (if any) related to such Mobile Applications.

When you use any of our Mobile Application, the Mobile Application may automatically collect and store some or all of the following information from your mobile device ("Mobile Device Information"), including without limitation:

- Your preferred language and country site (if applicable).
- Your phone number or other unique device identifier assigned to your mobile device such as the International Mobile Equipment Identity or the Mobile Equipment ID number.
- The IP address of your mobile device.
- The manufacturer and model of your mobile device.
- Your mobile operating system.
- The type of mobile Internet browsers you are using.
- Your geolocation.
- Information about how you interact with the Mobile Application and any of other aspects of ITACO Platform to which the Mobile Application links, such as how many times you use a specific part of the mobile application over a given period, the amount of time you spend using the Mobile Application, how often you use the Mobile Application, actions you take in the Mobile Application and how you engage with the Mobile Application.

 Information to allow us to personalize the Services and content available through the Mobile Application.
- We may use information automatically collected by the Mobile Application (including the Mobile Device Information) in the following ways:
- To operate and improve our Mobile Applications, other services, our company's Services, and tools; To create aggregated and anonymized information to determine which Mobile Application features are most popular and useful to Users, and for other statistical analyses.
- To prevent, discover and investigate violations of this Privacy Policy or any applicable terms of service or terms of use for the Mobile Application, and to investigate fraud,
- To customize the content or Services on the Mobile Application for you, or the communications sent to you through the Mobile Application.

We also provide some of your Personal Information (such as your first name and your photo, if you have chosen to upload your photo to your profile) to the driver/partner who accepts your request for roadside service so that the driver may contact and find you. The companies for which drivers work (that are providing the roadside service) are also able to access your Personal Information, including your geo-location data.

We may associate your unique mobile Device Identifier or Mobile Application usage information with any Personal Information you provide, but we will treat the combined information as Personal Information.

Personal Information may also be collected and shared with third parties if there is content from the Mobile Application that you specifically and knowingly upload to, share with or transmit to an email recipient, online community, website, or to the public, e.g., uploaded photos, posted reviews or comments, or information about you or your Services that you choose to share with others through features which may be provided on our Services. This uploaded, shared or transmitted content will also be subject to the privacy policy of the email, online community website, social media or other platform to which you upload, share or transmit the content.

(g) Information Collected from Job Applicants.

If you wish to apply for a job with ITACO, we will collect Personal Information such as your name, email address, phone number and may collect additional information such as resume. We use the information collected within this area of the web site(s) to determine your qualifications for the position in which you have applied and to contact you to set up an interview.

2. Use of User Information.

Our primary goal in collecting your Personal information or Usage Information is to provide you with Services.

We may send you e-mails to provide ITACO Platform to you, including to verify your username and password, to respond to your inquiries, to provide the Services you request, and to manage your account. We will communicate with you by email, telephone, or SMS or text message based upon your expressed preference where applicable.

We use the information collected from our Mobile Application for troubleshooting and in some cases, marketing purposes. We use your Internet Protocol (IP) address to help diagnose problems with our computer server, and to administer our web site(s). Your IP address is used to help identify you but contains no personal information about you.

By registering to ITACO Platform, you also consent to receiving various announcements about ITACO and ITACO Platform, (1) to provide you with information or Services or process transactions that you have requested or agreed to receive including to send you electronic newsletters, or to provide you with special offers or promotional materials on behalf of us or third parties; (2) to process your registration with ITACO Platform, including verifying your information is active and valid; (3) to improve the Services or our Services, to customize your experience with the Services, or to serve you specific content that is most relevant to you; (4) to enable you to participate in a variety of the Services' features such as online or mobile entry sweepstakes, contests or other promotions; (5) to contact you with regard to your use of ITACO Platform and, in our discretion, changes to ITACO Platform and/or ITACO Platform's policies; (6) for internal business purposes; (7) for inclusion in our data analytics; (8) to address maintenance or other issues with ITACO Platform and (9) for purposes disclosed at the time you provide your information or as otherwise set forth in this Privacy Policy. If you do not wish to receive them, you have the option of deactivating your ITACO account.

Please note that information submitted to ITACO Platform via a "contact us" or other similar function may not receive a response.

3. Sharing & Disclosure of User Information.

We may share non-personally identifiable information, such as aggregated user statistics and log data, with third parties for industry analysis, demographic profiling, to deliver targeted advertising about other products or Services, or for other business purposes. We do not sell, share, rent or trade the information we have collected about you, including Personal Information, other than as disclosed within this Privacy Policy or at the time you provide your information. We do not share your Personal Information with third parties for those third parties' direct marketing purposes unless you consent to such sharing at the time you provide your Personal Information. We may share user information of all types (including Personal Information) in the following circumstances:

(a) Your Request To Receive Information From Third Parties.

You may elect to have your Personal Information shared to receive information and/or marketing offers directly from third parties. If you do agree to have your Personal Information shared, your Personal Information will be disclosed to such third parties and all information you disclose will be subject to the privacy policy and practices of such third parties. We are not responsible for the privacy policies and practices of such third parties and, therefore, you should review the privacy policies and practices of such third parties prior to agreeing to receive such information from them. If you later decide that you no longer want to receive communication from a third party, you will need to contact that third party directly.

(b) Third Party Service Providers.

We use third party companies and individuals to facilitate ITACO Platform, provide or perform certain aspects of ITACO Platform on our behalf – such as Providers and other third-parties to host ITACO Platform, design and/or operate ITACO Platform's features, track ITACO Platform's analytics, process payments, engage in anti-fraud and security measures, provide customer support, provide geo-location information to our drivers, enable us to send you special offers, host our job application form, perform technical services (e.g., without limitation, maintenance services, database management, web analytics and improvement of ITACO Platform's features), or perform other administrative services. We may provide these vendors with access to user information, including Personal Information sharing is limited to only the information needed by the vendor to carry out the services they are performing for you or for us. Each of these vendors are obligated not to disclose or use Personal Information for any other purpose. This exception does not encompass our use of third-party analytics service providers who evaluate and provide us with information about the use of ITACO Platform and viewing of our content. However, such service providers may set and access their own cookies, web beacons and embedded scripts on your Device and they may otherwise collect or have access to information about you, including non-personally identifiable information. You acknowledge that these services providers/vendors/ may be based outside of Kingdom of Bahrain and You hereby consent to transferring your information outside the Kingdom of Bahrain as may be required.

We use a third-party hosting provider who hosts our support section of our website. Information collected within this section of our web site is governed by our Privacy Policy.

(c) Sweepstakes, Contests and Promotions.

If you elect to participate in a sweepstakes, contests, and other promotions (any, a "Promotion") through ITACO Platform, you are agreeing to official rules that govern that Promotion, which may contain specific requirements of you, including, allowing the sponsor of the Promotion to use your name, voice and/or likeness in advertising or marketing associated with the Promotion. If you choose to enter a Promotion, Personal Information may be disclosed to third parties or the public in connection with the administration of such Promotion, including, in connection with winner selection, prize fulfilment, and as required by law or permitted by the Promotion's official rules, such as on a winners list.

(d) Legal Protection and Compliance

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. Thus, we may access, use, preserve, transfer and disclose your information (including Personal Information), including disclosure to third parties such as government or law enforcement officials or private parties as we reasonably determine is necessary and appropriate: (i) to satisfy any applicable law, regulation, subpoenas, governmental requests or legal process; (ii) to protect and/or defend the Terms and Conditions for ITACO Platform, including investigation of potential violations thereof; (iii) to protect the safety, rights, property or security of the Company, ITACO Platform or any third party; (iv) to protect the safety of the public for any reason; (v) to detect, prevent or otherwise address fraud, security or technical issues; an /or (vi) to prevent or stop activity we may consider to be, or to pose a risk of being, an illegal, unethical, or legally actionable activity. Further, we may use IP address or other Device Identifiers, to identify Users, and may do so in cooperation with third parties such as copyright owners, internet service providers, wireless service providers and/or law enforcement agencies, including disclosing such information to third parties, all in our discretion. Such disclosures may be carried out without notice to you.

(e) Business Transfer.

We may share your information, including your Personal Information and Usage Information with our parent company, subsidiaries, and affiliates, our auditors, insurers, professional advisors, consultants on a need-to-know basis. We also reserve the right to disclose and transfer all such information: (i) to a subsequent owner, co-owner, or operator of ITACO Platform or applicable database; or (ii) in connection with a corporate merger, consolidation, bankruptcy, restructuring, the sale of substantially all of our equity interests and/or assets or other corporate change, including, during the course of any due diligence process. To the maximum extent allowable by law, the Privacy Policy will apply to the user information as transferred to the successor entity. However, user information submitted after a transfer to a successor entity may be subject to a new privacy policy adopted by the successor entity.

4. User- Posted Content

ITACO Platform may offer publicly accessible blogs or community forums or other ways to permit you to submit ideas, photographs, user profiles, writings, music, video, audio recordings, computer graphics, pictures, data, questions, comments, suggestions, or other content, including Personal Information (collectively, "User Content"). We or others may reproduce, publish, distribute, or otherwise use User Content online or offline in any media or format (currently existing or hereafter developed). Others may have access to this User Content and may have the ability to share it with third parties across the Internet. You should be aware that any User Content you provide in these areas may be read, collected, and used by others who access them. Thus, please think carefully before deciding what information you share, including Personal Information, in connection with your User Content. Please note that we do not control who will have access to the information that you choose to make public and cannot ensure that parties who have access to such publicly available information will respect your privacy or keep it secure. This Privacy Policy does not apply to any information that you disclose publicly, share with others, or otherwise upload, whether through ITACO Platform or otherwise. We are not responsible for the accuracy, use or misuse of any content or information that you disclose or receive through ITACO Platform.

To request removal of your User Content from our blog or community forum or similar features, contact us through info@itaco-tpa.com In some cases, we may not be able to remove your User content, in which case we will let you know if we are unable to do so and why.

5. Third Party Content & Links

ITACO Platform may contain content that is supplied by a third party, and those third parties may collect web site usage information and your Device Identifier when web pages from any online or mobile service are connected to your browser. In addition, when you are using ITACO Platform, you may be directed to other sites or applications that are operated and controlled by third parties that we do not control. We are not responsible for the privacy practices employed by any of these third parties. For example, if you click on a banner advertisement, the click may take you away from one of our websites onto a different web site. These other web sites may send their own cookies to you, independently collect data or solicit Personal Information and may or may not have their own published privacy policies. We encourage you to note when you leave ITACO Platform and to read the privacy statements of all third-party web sites or applications before submitting any Personal Information to third parties.

6. Social Media Features and Widgets

ITACO Platform may include social media features, such as the Facebook Like button, and widgets such as a "Share This" button, or interactive mini programs that run on our online and mobile platforms. These features may collect your IP address, which page you are visiting on our online or mobile platform and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly by ITACO. Your interactions with these features and widgets are governed by the privacy policy of the company providing them.

7. Maintenance of User Information

You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information provided as part of account registration. If your Personal Information changes, or if you no longer desire ITACO Platform, you may correct, delete inaccuracies, or amend information by making the change on our member information page or by contacting us through info@itaco-tpa.com. We will make good faith efforts to make requested changes in our then active databases as soon as reasonably practicable.

You may also cancel or modify your communications that you have elected to receive from the Services by following the instructions contained within an e-mail or by logging into your user account and changing your communication preferences.

If you wish to cancel your account or request that we no longer use your information to provide you Services, contact us through info@itaco-tpa.com.

We will retain your Personal Information and Usage Information (including geo-location) for as long as your account with ITACO Platform is active and as needed to provide you Services. Even after your account is terminated, we will retain your Personal Information and Usage Information (including geo-location, trip history, credit card information and transaction history) as needed to comply with our legal and regulatory obligations, resolve disputes, conclude any activities related to cancellation of an account (such as addressing chargebacks from your credit card companies), investigate or prevent fraud and other inappropriate activity, to enforce our agreements, and for other business reason. After a period, your data may be anonymized and aggregated, and then may be held by us as long as necessary for us to provide ITACO Platform effectively, but our use of the anonymized data will be solely for analytic purposes.

8. Minors Prohibited from Using ITACO Platform

ITACO cares about the safety of children. Because ITACO Platform is not directed toward minors, no one under 18 can register with or use ITACO Platform. We do not knowingly collect personal information from anyone under the age of 18. If we are notified that we have collected personal information from a person under 18, we will delete that information immediately upon notification. If you are a parent or guardian of a minor under the age of eighteen (18) and believe he or she has disclosed Personal Information to us, please contact us at info@itaco-tpa.com

9. Data Security

We use standard, industry-wide, commercially reasonable security practices such as encryption, firewalls and SSL (Secure Socket Layers) for protecting your information – such as any portions of your credit card number which we retain (we do not ourselves retain your entire credit card information) and geo-location information. Please note that data that is transported over an open network, such as the Internet or e-mail, may be accessible to anybody. We cannot guarantee the confidentiality of any communication or material transmitted via such open networks. When disclosing any information via an open network, you should remain mindful of the fact that it is potentially accessible to others, and consequently, can be collected and used by others without your consent. In particular, while individual data packets are often encrypted, the names of the sender and recipient are not. A third party may therefore be able to trace an existing bank account or relationship or one that is subsequently created. Even if both the sender and recipient are in the same country data may also be transmitted via such networks to other countries regularly and without controls, including to countries that do not afford the same level of data protection as your country of domicile. Password-protected areas of ITACO Platform can be accessed only with a valid username and password. Each password owner is responsible for keeping the password confidential and safe, as ITACO has no control or responsibility for this type of User information. If the password may have been stolen or might otherwise be misused, it is the responsibility for direct or indirect losses as regards the security of your information or data during its transfer via Internet. Please use other means of communication if you think this is necessary or prudent for security reasons.

10. ITACO's Right to Amend this Privacy Policy.

From time to time, we may update this Privacy Policy to reflect changes to our information practices. Any changes will be effective immediately upon the posting of the revised Privacy Policy. We encourage you to periodically review this page for the latest information on our privacy practices.

11. Personal Information Storage.

Please be aware that information we collect, including, Personal Information, will be transferred to, processed, and stored in the Kingdom of Bahrain.

The data protection laws in the Kingdom of Bahrain may differ from those of the country in which you are located, and your Personal Information may be subject to access requests from governments, courts, or law enforcement in the Kingdom of Bahrain according to laws of the Kingdom of Bahrain.

By using the Services or providing us with any information, you consent to this transfer, processing, and storage of your information in the Kingdom of Bahrain.