

Privacy Policy

NOTE: CarShareHFX has implemented measures to meet the standard required for restricting access and storage for personal information for outside of Canada.

effective June 1 2011.

Members' personal identifiable information will never be routinely transmitted to computer systems not located in Canada.

Only the driver's fob number and membership number will be transmitted to the servers in the US supporting our in-car computers.

CarShareHFX will require specific advance permission before it sends personal Information outside Canada (i.e., to obtain driving records of applicants from non-Canadian jurisdictions, to facilitate a Member's request for Guest memberships in CarSharing Organizations in other countries).

What Personally Identifiable Information (Information) does CarShareHFX collect about me and how does it collect it?

When you make an Application for Membership, become a Member, make a reservation, drive a vehicle and/or communicate with CarShareHFX, including for the purposes of payment, we need to collect certain Information about you in order to provide our services.

We ask for information necessary to identify you, assess your eligibility for membership, and once a member, to contact you to provide the requested service, track and/or confirm your vehicle usage, monitor fleet safety, and administer your Membership, including invoicing and payment.

As our service is available on a self-serve basis every hour of every day, and situations may arise at any time requiring that we contact a member about a current or upcoming reservation, we ask for information that would allow us to contact you in a timely manner.

If a member chooses to not be fully accessible (i.e., providing only a workplace phone number) they are responsible for any consequential problems arising as a consequence.

Choices that you make about your membership – for instance method of payment – may influ-

ence the Information that we collect from you. However, this Information will include at least some of the following about you, and/or collected in the following ways:

Name

- Legal Residence: Home and/or Business
- Your Phone Number(s) and email address(s) at which we may contact you
- Your Date of Birth
- Method of Payment (e.g. Credit Card – Account Number and Expiration Date)
- Your Drivers License Number(s) and Province(s)/Country of Issuance.
- Your Drivers Abstract (record) and insurance claims history.

Membership

- How you heard about CarShareHFX
- Name of Member who referred you
- Monthly Plan
- Monthly Payment details (may include Credit card and/or Banking details)

Vehicle Reservations – Internet and Telephone

When you make a vehicle reservation, we may use Internet "Cookies" and other security features to provide secure service for our Internet Reservation Website. We may also record any in-coming or -out-going telephone calls for quality control and data assurance purposes. In addition, we employ a third party Call Centre which will have access to some of your non-financial Information in order to provide you with service, including your telephone numbers, name and email address, as well as other Information as required. They may also record in-coming and/or out-going telephone calls for quality control, training, and data assurance purposes.

Vehicle Usage

When you drive a vehicle, we will also record Information that details your trip (e.g. which vehicle that you reserved; your trip start and end times, and dates; insurance preferences,

gas consumption, distance used and other Information related to the vehicle travel).

Electronic Trip Data Collection

In order to better serve you, CarShareHFX may employ electronic trip data collection, including electronic and real-time connections to the vehicles internal systems, as well as external electronic hardware and software. This may provide functions such as vehicle location, speed, travel times, and other Information used to calculate and/or verify invoices, maintenance and safety. This data may also be used to prevent fraudulent usage of CarShareHFX vehicles, and/or determine fines for late returns and other use outside the boundaries of the vehicle reservation and/or Driver Terms.

Third Party Data Collection

In order to provide you with service, CarShareHFX may employ electronic and manual data collection through third parties. This may include companies involved with providing our Reservation Website, electronic vehicle data collection, and call center services.

“Public Party” Data Collection – Express Consent to Obtain and Utilize

As part of the normal course of your Membership and use of the Service, CarShareHFX may also have access to, and collect, Information about you from: Traffic Tickets; Electronic Highway Toll systems; Parking Lot ticket, data systems and attendant; and other CarShareHFX Members’ and/or persons witness statements. Where this information pertains to monitoring the safe, lawful, and agreed-upon use of our vehicles, including but not limited to whether you were in control of a vehicle at a specific time as can be ascertained by such Information, you give CarShareHFX your express consent to obtain and use this Information.

The Information that we collect about you will be with your express or implied consent, by your request for our services. How we collect Information will depend on how you use our services. We may collect Information directly from you by phone, fax, e-mail, at the counter, upon your completion of an application, or through your use of our Web site.

You may choose not to provide some or all of your Information to us, but this may prevent us from providing our services to you or limit our ability to provide you with the level of service that you would otherwise expect from us.

How is my Information used or disclosed by CarShareHFX?

We strive to ensure a stress-free rental experience and are dedicated to building a rewarding and lasting relationship with every customer. In order to provide the level of service we believe you expect from us, we may use and disclose your Information for the following purposes:

General purposes – We use your Information to:

- Provide the services that you request;
- Do all things necessary to administer those services;
- Research, develop, manage, protect and improve our services;
- Unless you opt out, to conduct customer satisfaction surveys; and
- Maintain and develop our service oriented software and other business systems.

We may disclose your Information to other related and non-related organizations including:

- To your company or organization if you use our services under a corporate account;
- To your credit card issuers;
- To credit reporting and fraud checking agencies;
- To debt collection agencies, if you fail to pay monies owed to us;
- To government or private organizations responsible for the processing or handling of traffic or parking related violations;
- To driver licensing authorities, directly or through intermediary organizations, when needed to verify compliance with CarShareHFX's safe driver criteria and/or to verify license Information;
- To government, regulatory and law enforcement agencies where the disclosure is required or authorized by law; and
- To insurance companies

Use or disclosure for marketing purposes:

If you have not opted out of receiving marketing materials, we may use and disclose your Information to offer you products and services provided by CarShareHFX. CarShareHFX does not disclose your Information to Third Parties for the purposes of marketing.

Use to provide Customer Service:

When you provide us with your Information, we will enter your Information into the centralized CarShareHFX Reserveauto online reservation system database that is managed by Communauto Inc of Montreal, QC and the local CarShareHFX office computer systems and in physical files. Once your Information is in one of these CarShareHFX databases, it will not be used for any purpose not set forth in this policy. Some of your Information will be accessible by CarShareHFX, and our Third Party service supplies such as call centre operators.

How does CarShareHFX protect my Information?

We take reasonable steps to protect all of the Information we hold from misuse, loss, unauthorised access and modification or disclosure in violation of this policy. This protection applies in relation to Information stored in both electronic and hard copy form. Access to the CarShareHFX databases are restricted to authorised personnel and is password protected. Information transmitted through our Web site is encrypted.

Can I access the Information that CarShareHFX has about me?

You may access any Information that we have collected about you subject to certain exceptions. We will normally provide access without charge unless you either request access to a large volume of Information or we have to access archived records to obtain the Information. In these circumstances, we may impose a reasonable fee. We will advise you of that fee in advance. You may challenge the reasonableness of the cost. Details of how to contact us are set out below. There may be instances where we may not be able to provide you access to your Information, for certain reasons. Among these are; it has been destroyed or deleted after ex-

piry of applicable retention periods, it contains Information of other persons or it contains commercially sensitive or proprietary Information owned by us. If we are unable to provide you access, we will explain why and document that for our records.

Tell us if we need to update your Information or preferences:

You play an active role in assisting CarShareHFX in maintaining the accuracy of your Information for as long as it is used for the purposes set out in this policy. Your prompt notification of any changes to your Information will assist us. You can update your preferences and your Information by contacting the CarShareHFX Privacy Officer at the contacts set out in this policy. If we don't agree to make the changes, you may challenge our decision.

Use of Web Site Tracking and Cookies:

Use of Internet Protocol (IP) Addresses: An IP address is a unique number that is automatically assigned to your computer whenever you are surfing the Internet so that your computer can be identified by the main computers, known as Web servers that serve Web pages. This allows us to identify and gather general Information and data about your use of the site, such as the Web pages viewed on CarShareHFX.com, CarShareHFX.net, and/or other websites used by CarShareHFX to provide you service.

CarShareHFX collects IP addresses for the purposes of: helping us diagnose problems with our main computers, for system administration, to report aggregated Information to our business partners, and to audit the use of our Web site. When Users request Web pages from our Web site, our Web servers log the User's IP address. We do not normally link IP addresses to anything personally identifiable, which means that a user's session will be logged, but the user will remain anonymous to us. For example, we collect and/or track the home server domain name, the type of computer, and the type of Web browser used by you to access our Web site. We gather such collection and tracking Information as you navigate through our Web site, and will be used by us for our business purposes only. We can, and will, use IP

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addresses to identify you when we feel it is necessary to enforce compliance with our Web site Terms of Use or to protect our service, site, users, or others.

Cookies: What are cookies?

Cookies are small pieces of Information that a Web site sends to your computer for record-keeping purposes, which Information is stored in a file on Your computer's hard drive. Cookies make Web-surfing easier for you by saving your preferences so that we can use the saved Information to facilitate your use of Our Web site when you return to the Web site. Cookies do not tell us your individual identity unless you have chosen to provide it to us. We never save passwords or credit card Information in cookies. The use of cookies is an industry standard, and as such, you will find that most major Web sites use them.

You can delete your cookie file at any time. Most Web browsers are initially set up to accept cookies. You can reset Your Web browser to refuse cookies or to indicate when a cookie is being sent. However, note that some parts of CarShareHFX and/or CarShareHFX's affiliates' services will not function properly or may be considerably slower if you refuse cookies. For example, without cookies, you will not be able to set personalized preferences, and/or may have difficulty completing transactions.

CarShareHFX may use cookies to track Website usage trends and patterns. This helps us to understand our users' needs better and improve our Website. While both of these activities depend on the use of cookies, you have the option of disabling (refusing) the cookies via your Web browser preferences.

What you consent and agree to:

When you provide us with your Information, you consent and agree to our use and disclosure of your personal Information in accordance with this Policy including, in particular to:

- Our collection, use and disclosure of that Information in order to provide the service you have requested, to administer the rental,

to provide customer services, and to operate our business, including verifying actual time and distance information for your trips, as described in this Policy;

- If you do not opt out, our use and disclosure of your Information for CarShareHFX direct marketing purposes and customer satisfaction surveys.
- If you do not disable cookies, our collection of Information about your Web site visits for the purposes described in this policy.

Changes to this Policy:

This is our current privacy policy outlining our Information management practices. It replaces any other privacy policy published by us prior to the date below. **We may change this policy from time to time. If operations require that we make changes to this policy, we will provide you with at least 30 days notice of the proposed changes and an explanation and if you object to these changes, then you can discontinue your membership or drivers agreement with us and we will not be entitled to apply those changes to you.** If you have any questions, need to modify, or delete your Information or to obtain an up to date copy of our privacy policy, contact us.

This Policy was last updated May 23, 2011.

Whom can I contact for further information?

If you wish to contact us, (1) to inquire about our privacy practices; (2) to provide feedback and comments; (3) to access or correct your Information we have; and/or (4) to opt out of further communications, contact us as detailed below.

We offer customers the opportunity to opt out of use and disclosure of the customer's Information for marketing purposes and customer satisfaction surveys. Customers can elect to opt out from any communications for these purposes by contacting us as detailed below.

Privacy Officer
CarShareHFX – CarShare Atlantic Ltd.
2459 Agricola St,
Halifax, N.S. B3K 4C1
Phone: 902 406 7439
Fax: 902 406 7431
email: privacy@CarShareHFX.ca

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Dispute Resolution

If you are not satisfied with the way in which we handle your inquiry, please contact Pam Cooley, President, at the above phone or address.