

# Privacy Notice

This Privacy Policy is effective from **March 21, 2025**.

## 1 What is this privacy policy about?

In this privacy policy, we describe how we collect and process your personal data when:

- you visit our website;
- you use the ShareP Platform and the parking spaces offered via the ShareP Platform;
- you apply for a position with us;
- we receive your personal data for other purposes within the scope of our business activities.

## 2 Who is responsible for your personal data?

The company responsible for a particular data processing operation under data protection law is the company that decides whether, for what purpose and how the processing is carried out.

For the data processing described in this privacy policy, one of our two affiliated companies, ShareP AG (Switzerland) and ShareP Poland PSA (Poland), is responsible. As a rule, the company that has drawn your attention to this privacy policy (for example, when you use its services) is responsible.

With regard to data processing on the ShareP Platform in connection with your use of a parking space provided via the platform, we share responsibility with the owner of the parking space in question (joint controllership). Also in these cases, we remain your primary point of contact with regard to data protection compliance (e.g. if you wish to exercise your rights as a data subject).

You can contact us using the following contact details:

### General contact for data protection issues

[privacy@sharep.io](mailto:privacy@sharep.io)

#### ShareP AG

(UID: CHE-458.596.730)  
Apfelbaumstrasse 45  
8050 Zürich  
Switzerland

#### ShareP Poland PSA

(KRS: 0000933251, REGON: 520473552, NIP: 8943176679)  
ul. Hubska 52  
50-502 Wrocław  
Poland

ShareP Poland PSA is the EU representative for ShareP AG.

## 3 Applicable Law

This privacy policy is based on the provisions of the Swiss Federal Act on Data Protection (FADP) and the EU General Data Protection Regulation (GDPR). Which of these legislations applies in each case depends on the specific situation.

## 4 What personal data do we process?

### 4.1 When you visit our website

When you visit our website, the server automatically logs general technical information. This data includes, for example, the IP address and operating system of your device, the type of browser you use to access our website, the date and time of your visit, the website you came from, and the type of browser you use to access our website, the date and time of access and the sub-pages that you visit on our website.

When you fill out our contact form, sign up for our newsletter or contact us in any other way through the website, we collect the contact and other relevant personal data that you provide to us, as well as any technical data that may be collected in the process.

We use the following cookies and other tracking technologies (for the sake of simplicity, collectively "Cookies"):

- technical and functional Cookies to ensure the functionality and security of our website, and to make it easier for you to visit our website;
- statistics Cookies to evaluate the use of our website and to collect information to improve our products and services,
- marketing Cookies.

Insofar as these technologies are not necessary for our website to function, they will only be activated if you give us your consent to do so.

We use social media plugins and embedded media from external platforms such as YouTube to offer you multimedia content. When you access/use a plugin or embedded media, certain technical data is transmitted to the provider of these services. If you have an account with the relevant provider and are logged in, this interaction may also be captured. Please consult the privacy policies of the respective providers for more information about their data collection and processing.

### 4.2 When you use the ShareP Platform and the parking spaces offered via the ShareP Platform

When you use the ShareP Platform, we process the following categories of your personal data:

- Identification data and contact details (e.g., name, email, phone number);
- Login data;
- Activities (parking spaces booked, etc.);
- Communication content;
- Financial data (e.g. payments, transaction history);
- Technical data including usage data, location data, system activity logs;
- App analytics data (e.g. error and activity logs).

As part of access control and management of the parking spaces provided via the ShareP Platform, we use cameras to automatically recognize license plates (so-called "ALPR"). You can find more information in the [Privacy Policy ALPR](#).

### 4.3 When you apply for a position with us

When you apply for a position with us, we collect and process the necessary personal data to review your application and conduct the application process. This includes, in particular:

- Identification data and contact details (e.g., name, email, address, phone number);

- Communication content;
- Information about your professional background and qualifications;
- The content of your application;
- Other data necessary for the review of your application.

You submit most of this data directly to us as part of your application. In addition, we process data from other sources, in particular from references (if you have consented to references being obtained), as well as from publicly accessible sources (e.g., professional social networks, the internet).

#### **4.4 When we receive your personal data for other purposes within the scope of our business activities**

In the course of our business activities, we process personal data of other individuals, such as our contacts at potential and current customers (parking lots owners), business partners, suppliers, and service providers. The personal data we process in this context primarily includes identification data, contact details, and communication content, as well as other relevant personal data.

We receive this data either directly from you or from other sources, such as your coworkers, our business partners and other contacts, as well as from publicly available sources (e.g., professional social networks).

### **5 For what purposes do we process your personal data?**

We process your personal data primarily for the following purposes and based on the following grounds for processing:

- for the preparation, conclusion, fulfillment and enforcement of contracts in the course of our business activities, e.g. contracts for the use of the ShareP Platform.
- based on and within the scope of your consent, if applicable. You can revoke your consent at any time.
- to comply with legal obligations (e.g., keeping of business records).
- where legally permitted, based on our interests to communicate with you and third parties (even outside the preparation or conclusion of a contract), to provide the website and the ShareP Platform, to optimize your user experience, to maintain and potentially expand our business relationship with you, to improve, expand, and market our offerings, to ensure IT security and data protection, to prevent crimes and other misconduct, and to enforce, defend, or avert legal claims.

Based on your consent or our interest in informing existing customers about new developments, we may send you marketing information (e.g. via push notifications in the ShareP app or via a newsletter). To help us understand how you use our offers and customize them for you, we track whether and when you open these marketing messages. For emails, you can prevent this in your email program by disabling the automatic download of images. Furthermore, you at any time have the option to refrain from receiving our marketing messages.

### **6 When do we disclose your personal data to third parties?**

To fulfill a contract, protect our interests, or comply with legal requirements, it may be necessary for us to disclose your personal data to third parties. This includes, in particular, transfers:

- if you use a parking space provided through the ShareP Platform: to the owner of the parking space in question;
- between our two affiliated companies ShareP AG (Switzerland) and ShareP Poland PSA (Poland);

- to our IT service providers and other third-party providers whose services we use for the purposes described in this privacy policy;
- in cases where disclosure is necessary to (i) comply with legal obligations, (ii) ensure IT security and data protection, or (iii) enforce, defend, or avert legal claims;
- to third parties to whom we transfer our company or parts thereof, or with whom we merge.

In this context, we also transfer personal data between countries. We limit the transfer of personal data outside Switzerland, the EU, and the EEA as far as possible, but it cannot be entirely avoided. If the respective country does not have a level of data protection recognized by Switzerland, we use standard contractual clauses to ensure adequate data protection, where necessary and possible supplemented by additional security measures.

We do not sell or rent personal data to third parties.

## 7 Data security

We protect your personal data with appropriate technical and organizational security measures against accidental, unlawful, or unauthorized manipulation, deletion, alteration, access, disclosure, use, or loss.

Personal data in the ShareP Platform is protected by the following security measures, among others:

- Data location EU;
- Encryption of data in transit and at rest;
- Secured, certified servers;
- Server monitoring;
- Regular backups;
- Access restricted to employees with need-to-know;
- Employee awareness training.

## 8 How long do we retain your personal data?

We store your personal data only for as long as and to the extent necessary for the purposes described or for legal reasons.

Data stored on the ShareP Platform can be restored for up to 6 months after the corresponding account has been deleted. After that time, it will be permanently deleted or anonymized.

## 9 What rights do you have in connection with your personal data?

If provided for and subject to the conditions of the applicable data protection laws, you have the following rights in connection with your personal data:

- Right to access your personal data;
- Right to have inaccurate personal data rectified;
- Right to erasure ("right to be forgotten");
- Right to restrict the processing of your personal data;
- Right to data portability (transfer of your personal data to you or a third party);
- Right to object to the processing of your personal data.

Please note that exceptions apply to these rights. In particular, we may be obliged or entitled to further process your personal data to fulfill a contract, to protect our legitimate interests such as enforcing, defending, or averting legal claims, or to comply with legal obligations. In these cases, we can or must reject certain requests or comply with them only to a limited extent.

To exercise your rights in connection with your personal data, please contact us by email at [privacy@sharep.io](mailto:privacy@sharep.io).

## **10 Complaints**

If you are not satisfied with how we process your personal data, you have the right to file a complaint with your competent supervisory authority (in Switzerland: [Federal Data Protection and Information Commissioner FDPIC](#), in Poland: [Personal Data Protection Office UODO](#)).

Please contact us first before filing a complaint. This way, we can try to resolve your issue directly. The easiest way to contact us is by email at [privacy@sharep.io](mailto:privacy@sharep.io).

## **11 Links to other websites**

Our website may link to third-party websites that are not operated or controlled by us. We are not responsible for whether and how these third parties comply with data protection regulations.

## **12 Changes to this privacy policy**

We may modify this privacy policy from time to time. New versions become effective for you as soon as we have notified you by publishing them on our website.