

PRIVACY POLICY

A. Introduction

This is the Privacy Policy of Nimbus Venture (Pvt) Limited, a company duly incorporated and existing under the laws of Sri Lanka [bearing Registration No. PV77418] and having its Registered Address at No.7, 8th Lane, Nawala Road Nawala (hereinafter referred to as “Nimbus”) providing the service of the “Nimbus MyCar” application. (collectively, the “Services”) provided by Nimbus. This Privacy Policy describes our practices in handling the information that you provide to us and that we collect about you as a user of our Services.

This Privacy Policy describes our practices in handling the information that you provide to us and that we collect about you as a user of our Services.

Your privacy is important to us and we want to assure you that the Personal Data we collect about you will be treated with care. This Privacy Policy will inform you about how we look after your Personal Data when you avail of our services using various means such as visiting our website or application.

This Privacy Policy applies to all Users of our Services. We may store, maintain, process, and/or transfer the information you provide to us and that we collect about you in a country or countries that may have less strict data protection laws than in the country where you reside. If so, we will take reasonable measures to protect your information following this Statement.

Your use of our Services indicates your agreement with and consent to our practices described in this Privacy Policy. If you do not consent to or agree with this Privacy Policy, please do not use any of our Services or participate in any of the features or activities relating to the Services.

B. Information We Collect.

a. With the Nimbus GPS Hardware Device

We collect vehicle-related data from the user’s vehicle when a user is registered with our Nimbus Platform for MyCar services, and the Nimbus GPS Hardware device is installed in the user’s vehicle. This vehicle-related data includes, GPS location of the vehicle, speed of the vehicle, ignition status, vehicle angle data, battery data, fuel data, and any other vehicle-related data which can be gathered by the GPS hardware device.

b. With the Nimbus MyCar Agent Android Application

This information is provided by the user when the user registers with our services. This information includes first name, last name, email address, national identification number, mobile phone number, vehicle registration number, vehicle type, vehicle make, and vehicle model.

Information about the type of mobile device being used by you will also be collected.

c. With the Nimbus MyCar Mobile Application (iOS and Android)

Your Information.

We collect the information you provide to us in connection with the Nimbus MyCar application(iOS and Android), such as when you log into your account, contact our customer service, or otherwise communicate with us. This information includes your email address.

Your vehicle Information.

We collect the vehicle information you provide to us such as fuel records, service records, emission test records, repair records, insurance records, revenue license records, and alignment records including payment amounts, dates and odometer readings.

Information from Third Parties or Other Sources.

We also receive information about your name and email address from Google for authentication purposes when you log in from your Gmail account and Nimbus MyCar has no control over the information shared by such third parties.

C. Legal basis for using your information;

Nimbus shall only collect, process, use, share and store your personal information where we are satisfied that we have an appropriate legal basis to do this. This may be because of:

- The need to use your personal information to perform a contract or take steps to enter into a contract with you.
- The need to use your personal information for our legitimate interest as a commercial organization. In all such cases, we will look after your information at all times in a proportionate way, respect your privacy rights, and, is following our Privacy Policy, and you have a right to object to the processing as explained in Legal rights available to help manage your privacy;

- The need to use your personal information to comply with a relevant legal or regulatory obligation that we have.
- The need to have your consent to use your personal information for a particular activity.
- The need to use your personal information to protect your vital interests.

D. How We Use Collected Information.

We will only use your Data in the manner permitted by law. Most commonly, we will rely on the following types of basis to process your Personal Data:

Comply with a legal or regulatory obligation:

Processing your data may be necessary for compliance with a legal or regulatory obligation to which we are subject to.

To Provide and Improve the Services.

Nimbus uses the information we collect to respond to your requests, send you updates, and otherwise communicate with you; facilitate and otherwise process transactions; improve the MyCar Services provided to you; respond to your inquiries; prevent illegal activities; comply with court orders, government requests, and other applicable legal requirements; enforce our Terms of Use and otherwise provide you the Services. We may share your information with our consultants, and other service providers as necessary to provide you with Services.

For Internal Purposes.

We may use the information we collect for our internal business purposes, for example, to manage the content of our application or to assess the amount of online traffic to our application.

To Communicate.

You will receive emails, text messages, phone calls, and other communications from us to provide you with our Services, provide updates, or respond to inquiries made about our application.

Platform Permissions.

Most mobile device platforms (iOS, Android, etc.) have defined certain types of device data that apps cannot access without the device owner's permission, and these platforms have different methods for how that permission can be obtained. The first time our mobile app wants to access your data, the iOS, Android, and mobile platforms will alert you, and you will be able to consent (or not consent) to that request to access data. An Android device will notify you that our mobile app wants to access your data before you first use the app, then your subsequent use of the app constitutes your consent.

Advertising.

Information will be used to display interest-based advertisements for features, products, and services that might be of interest to you.

Customer support.

Nimbus may use the information that is collected (including recordings of customer support calls with notice to and the consent of the user) to provide customer support, including direct questions to customer support persons, Investigate and address user concerns, monitor and improve our customer support responses and processes and other customer support related matters.

For Marketing Purposes and Market Research

To conduct marketing activities and to conduct market research relating to the MyCar service only and shall not at any time divulge for monetary or any other gain, such information to any third party to use for any other marketing /promotional purposes.

E. How We Share Your Information

Nimbus may work with third-party partners to provide and improve the Nimbus MyCar service. When doing so we will impose strict restrictions on how our partners can disclose the data we provide.

With subsidiaries and affiliates of Nimbus to provide MyCar services or conduct data processing on our behalf.

Disclose information under any governmental, judicial, or administrative order, regulatory request, or similar method.

With measurement partners: Nimbus will share information with companies that aggregate it to provide analytic and measurement reports to Nimbus.

Other than the above, Nimbus will not disclose your personal information without your consent unless disclosure is either necessary to prevent a threat to life or health, authorized or required by law, reasonably necessary to enforce the law, or necessary to investigate a suspected unlawful activity.

F. Third-Party application:

You might find external links to third-party applications on our Platforms. Our Privacy Notice does not apply to your use of a third-party site. We are not responsible for the privacy practices of applications that are not operated by Nimbus and encourage you to read the privacy statements of any such third-party site.

G. Your Access to Information

You may request access to your personal and account information to review it and make corrections, additions, and/or deletions at any time as allowed by applicable law. Please note that we may retain certain information if it is required by law or for legitimate business purposes, such as to follow up on any breach of our Terms of Use, evidence of any fraudulent activity, and protect our rights or the rights of others.

H. Data Retention

Your information will only be retained for as long as necessary to fulfill the purposes we collected it for, including the purposes of satisfying any legal, accounting, or reporting requirements. To comply with applicable laws locally, we may store your data for up to 12 years from the time of receiving it.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your data, the purposes for which we process such data, and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, we may anonymize your data (so that it can no longer be associated with you and you can no longer be identified by it) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

I. Security Measures

We are dedicated to ensuring that your account and information remain secure. Nimbus uses generally acceptable security measures to protect your personal information against unauthorized access, use, loss, misuse, and alteration when such information is solely within our possession or control.

Please note that despite all precautionary steps, no data transmission over the Internet can be guaranteed to be 100% secure. Nimbus will use commercially reasonable measures to protect your information but does not warrant that the information transmitted to us will be secure at all times.

J. Notice:

If you have any comments, questions, or concerns about the contents of this Privacy Policy or how we use your information, we encourage you to contact us through the contact details provided on the application to see if we can help resolve the issue in the first instance.

K. Change:

Nimbus will amend this Privacy Policy from time to time following applicable laws and regulations, and the updated version will be posted on the application and website. We request that you revisit this website from time to time for updates on the Privacy Policy. Historic versions of this Privacy Policy can be obtained by contacting us.

The Privacy Policy may be translated into different languages, and in the event of any inconsistency among the versions, the English version shall prevail.