



Modo Privacy Policy

Modo's privacy policy outlines our commitment to respecting our members' personal information. We endeavour to communicate clearly what information we will collect, the reasons for collecting personal member information, the ways that the confidentiality of this information is protected, and finally, how members can request a copy of the personal information that is recorded.

Modo is an independent co-operative and member information is not automatically shared with other organizations with which we are affiliated. Members (and potential members) can always choose not to provide Modo with some or all personal information; however, this decision may prevent Modo from determining membership eligibility and the ability to provide members with full access to available or requested services. We will not collect your personal information without your consent.

Privacy officer

Modo is responsible for the personal information that is collected from our members. Modo's Privacy Officer can be reached by email at privacy.officer@modo.coop or at

Privacy Officer, Modo
200 - 470 Granville Street
Vancouver, BC V6C 1V5
604-685-1393

Reasons for collecting personal information

Modo collects personal information so that we can:

- Determine membership eligibility;
- Communicate with members about their participation in Modo's carsharing program and other services requested by the member—including but not limited to follow-up

about vehicle bookings and usage, invoices, newsletters, organizational announcements, etc.;

- Improve our services through member surveys and consultation conducted directly by Modo or by approved third parties;
 - Ensure members are using vehicles in an appropriate manner;
 - Ensure policies pertaining to carsharing with Modo are followed by members; and
 - Comply with legal and insurance requirements.
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The kind of information Modo collects

As part of member participation in a carshare program, Modo collects a variety of information about its members. Typically, such information includes but is not limited to:

- Contact information, including your home address, telephone number, and email address;
 - Member eligibility and insurance needs, including such items as driver's licence, driving records (listing traffic violations) and claims history (listing claims made on your insurance policies);
 - Credit information and history, including your credit report;
 - Payment information, including your banking information, a record of your payment, your credit card information if you choose to make payments by credit card, and other information that you provide so that we can collect payment;
 - Vehicle usage information, including driving speeds and vehicle location;
 - Membership history at Modo; and
 - Publicly available information.
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How Modo collects information

For a majority of the time, Modo collects personal information directly from the member through application forms, surveys, member-initiated communications, and information that a member directly requests a third party to send to Modo. If we are communicating with a member by telephone, email or any form of electronic communication, we may record such communication for quality assurance purposes. In-vehicle telematics will provide information on vehicle usage including but not limited to driving speeds and locations. In some appropriate

circumstances, we obtain information from third-party sources—for example, affiliated carshare organizations whose members want to become roaming members with Modo. Driving records and credit information may be obtained from third-party sources such as other insurers or credit reporting agencies, as appropriate.

Member consent

Member knowledge and consent are required for the collection, use or disclosure of personal information, except as required or permitted by applicable law. Modo only collects, uses or discloses personal information for purposes that are necessary to deliver carsharing services, or that we believe members would consider appropriate under the circumstances. For these purposes, we may make personal information we collect available to our employees, agents, service providers, insurers and business partners. When a person becomes a member of Modo, we will use his/her name and address for mailing and billing purposes, including sending account statements and newsletters.

Except as set out in this policy, or as required or permitted by applicable law, Modo does not sell or disclose any personal information to any other organization and Modo will not transmit personal information to third parties without first obtaining consent to do so. Modo will never sell our member information. Modo may, however, disclose information in the following cases:

- to our lawyers and auditors;
- to a police force as required by law;
- in emergency situations affecting the life, vital health or safety of a member or individual;
- to all other persons or government agencies authorized by law;
- to credit reporting agencies or to an agent retained by Modo in connection with the collection of your account, if your account is in default or if requested by you;
- to a person who, in the reasonable judgment of Modo, is seeking information as a member's agent; or
- to a third party or parties where you consent to such disclosure.

Modo will also occasionally share aggregated information about our members. This information does not contain any personal information.

Limiting collection, use and retention

We collect only the information that we need in order to deliver services and information to our members.

We do not use or disclose personal information for any purposes other than those for which it was collected, except with the member's consent or as required or permitted by law.

Personal information is retained only as long as necessary for the fulfilment of the purposes for which it is to be used. Modo does not keep personal information if it is no longer needed for the purposes required or as required by law.

Accuracy

Members' personal information is kept accurate, complete and up to date as is necessary and reasonably practical for the purposes for which it is to be used.

Safeguards

We protect personal information by using safeguards that are appropriate to the sensitivity of the information, in accordance with Part 9 of BC's Personal Information Privacy Act.

Our Employees' Responsibilities: Each of our employees is responsible for maintaining the confidentiality of all personal information to which they have access. We keep our employees informed about our policies and procedures for protecting personal information, and each employee and contractor signs a confidentiality agreement upon being engaged by Modo. If Modo contracts with an outside agency or contractor, Modo will ensure that they adhere to Modo's Privacy Policy.

Openness

We will make our policies and practices relating to the management of personal information readily available to our members.

Member access

Upon request in writing, a member will be informed of the existence, use and disclosure of their personal information and will be given access to that information. We will assist any member who informs us that they need assistance in preparing a request concerning personal information. Members may challenge the accuracy and completeness of the information and have it corrected as appropriate.

Accessing Personal Information: If a member wishes to review or verify the personal information that Modo holds about them, or find out to whom we have disclosed it, they can do so by writing to us. Modo will normally respond within thirty (30) days to a request for access to personal information. Modo can refuse access in certain circumstances.

Accuracy of Personal Information: A member can ask to correct any of their personal information. The request for correction must be made in writing to us, either by mail, fax or email at the aforementioned address.

Challenging Compliance: Members can address any challenge concerning our compliance with this policy to our Privacy Officer. Modo has established an internal complaint resolution procedure for privacy and information matters. Complaints are reviewed by the Privacy Officer, who will consult with the Chief Executive Officer, board members or other advisors, as appropriate. A written response will be provided to the individual, usually within thirty (30) days.

Canada's Anti-Spam Law

Modo makes every reasonable effort to comply with Canada's Anti-Spam Law. Any member that has received an electronic message in error or has any other concern with Modo's electronic message policies and practices should contact us.