

## **RebelRoam Privacy Policy**

RebelRoam operates primarily as a provider of business-to-business services. Unlike many companies, we do not focus on consumer users or the collection of consumer data. We have a website, but this is a straightforward landing page and we do not collect any personal data on our website. We have implemented some cookies for analytical purposes, the Cookie Notice is available on our website. Additionally, we provide HotSpotSystem for some passengers, and for such data processing different terms apply which are available below.

If you have any questions related to this notice or in case of any suspected infringement of your personal rights, please contact us at [helpdesk@rebelroam.com](mailto:helpdesk@rebelroam.com).

### **We don't collect or share personal information That's a short version of our privacy policy**

There are two categories of individuals we are engaged with:

- Contact details of the employees representing our customers (the transportation companies)
- Passengers who are using Wi-Fi network provided by transportation companies. Passengers are using Wi-Fi network services via filtering and optimisation service RebelRocket. Please read more about RebelRocket data processing model in the next section of this Privacy Policy.

### **Employees of customers**

Our lawful basis for collecting personal information about employees is in order to fulfil our contractual obligations to our customers. We retain the contacts as long as we believe employee is representing the company and the company is using or have an interest in our products and services.

We will use information regarding the employees of transportation companies to keep companies informed about developments in our business and services. If company has requested a trial of our services, we will use the information in order to provide the trial access, and to follow up with a company afterwards on experience of trying our services.

Such information may include name, job title, company name, postal address, e-mail address and telephone number. We expect that any personal information we receive from our customers is necessary to represent the company and therefore such information is considered as business information.

We are sending to our contacts transactional messages, including responses to questions, and requests; provide customer service and support; send technical notices, updates, security alerts, and support and administrative messages; and send information regarding billing for our services. We may contact the employees of our customers in order to comply with legal obligations as well as to investigate and prevent fraudulent transactions, unauthorized access to the services, and other illegal activities. We also use contact information to process and complete transactions, and send customers related information, including purchase confirmations and invoices.

## RebelRocket

RebelRocket is data optimisation service for Wi-Fi networks. RebelRocket enables to optimise the internet traffic and filter the access to webpages, applications and services as well as limit the performance of webpages, applications and services. RebelRocket does not enable to monitor the internet traffic in way that could lead to identifying passengers or individual internet behaviour (e.g. browsing history).

RebelRocket service is designed by default to take appropriate technical and organisational measures which comply with the requirements regarding the security of the personal data as set out in the data protection laws and regulations.

**Data Subjects.** The personal data processed concerns the passengers who are using Wi-Fi network access in moving vehicles.

**Purposes of the processing.** The processing is intended to enable the transportation companies to monitor the Wi-Fi network to optimize the network traffic and usage. RebelRocket service does not collect any information through its systems that can be connected to end user's person (for example name, MAC address, phone number or e-mail), hence RebelRocket service does not monitor the internet traffic in way that could lead to identifying end-users or individual internet behaviour (e.g. browsing history).

RebelRocket Service works as a specialized DNS policy server that allows to receive and resolve Wi-Fi users DNS requests. Any request is answered with an IP address that defines the server where the website content is served from (i.e. where the website is hosted). Once the request has been answered, then further traffic between the user and server is not passing through RebelRocket DNS service.

When passengers in the Wi-Fi network want to access a web service, the following steps take place: 1) passenger's device (mobile phone, laptop etc.) sends a DNS request to the router installed onboard of the vehicle; 2) that router sends the request to RebelRocket DNS service; 3) RebelRocket replies the request to the router; 4) router stores the answer and replies to user's device. All DNS requests coming to RebelRocket are made by the router and hence reveal only information about what web services are used by the passengers connected to vehicle's Wi-Fi network, but not who is individually trying to connect and not the specific content of the request.

In simple words, RebelRocket works as a specialized server that allows to receive and resolve Wi-Fi users DNS requests. Any request is answered with an IP address that defines the server where the website content is served from (i.e. where the website is hosted). Once the request has been answered, then further traffic between the user and server is not passing through RebelRocket DNS service.

Those DNS requests only reveal information about what web services are used by the passengers connected to the onboard router of the vehicle, but not who is trying to connect and not the specific content of the request (for example RebelRocket enables to see that there is a request to access YouTube, but that request does not reveal what specific video is being watched or who was the individual passenger who made this request).

**Categories of Data.** When passenger uses the Wi-Fi network provided by the transportation companies, some technical data is collected automatically. Such data does not enable to identifying passengers or individual internet behaviour via RebelRocket services. In most cases, RebeRoam is not the owner nor manager of the Wi-Fi network.

When passenger uses the Wi-Fi network provided by RebelRoam, some technical data is collected by the router automatically. Router is a networking device that performs the traffic directing functions on the internet and enabling Wi-Fi network onboard of the vehicle.

To initiate and maintain the connection between the passenger and the router, passenger's MAC address is needed. However, this info is only kept in Random Access Memory (i.e. it is not saved on permanent bases). As soon as the router is switched off, respective MAC-address info is discarded. Hence, no historic MAC-address data is collected.

Although router must know what web services the passenger is trying to connect to, this info is only kept in Random Access Memory of the router (i.e. it is not saved on permanent bases). All data is discarded once it's expired (TTL – Time To Live - expires) or, as soon as the router is switched off.

**Types of Personal Data.** No personal data (including IP address or MAC identifier) are processed or stored in any of the services provided by RebelRoam. Only aggregated and obfuscated data is collected and processed in the RebelRocket service. The data processed in the RebelRocket service is revealed only to the employees of the RebelRoam for analytical and maintenance purposes. This data processed does not enable to identify the passengers using the Wi-Fi.

**We do not share Personal Data.** If passengers have any request or questions regarding the personal data processing during the Wi-Fi usage in vehicles, they should ask form transportation companies. RebelRoam is not providing to transportation companies any technical tools or possibilities to track the behaviour of passengers. Also, like anyone else, we will comply with court ordered legal requests. However, in our case, we don't expect any because there is nothing useful to give them since RebelRoam doesn't collect any personal information.

## HotSpotSystem

In some occasions, RebelRoam provides third-party hotspot management and billing system called HotSpotSystem to enhance public Wi-Fi network access at transportation vehicles.

The information submitted by passengers during the account registration is controlled by Hotspot System Ltd. (Liszt Ferenc ter 10, Budapest / Hungary, H-1061). Please read more about HotSpotSystem privacy terms <http://www.hotspotsystem.com/privacy>.

**Data Subjects.** The passengers who are using Wi-Fi network provided by RebelRoam and access to that network via sign in process.

**Purposes of the processing.** Some transportation companies provide the possibility to use Wi-Fi network via designated Wi-Fi network password or to purchase additional Wi-Fi access. Third-party service provider HotSpotSystem is providing sign in process and payment solutions. HotSpotSystem is an additional service that works in combination with optimisation service RebelRocket.

**Categories of Data.** The information passengers provide for registration of account and payment execution. Any credit card payment transactions are processed and stored by external data processors. Passengers may use HotSpotSystem helpdesk solution in order to ask assistance and support with the hotspot account. No payment information (i.e. credit card numbers) is stored or processed by RebelRoam or HotSpotSystem.

**Types of Personal Data.** Name, email and country of origin for account registration; additionally, phone number and address for payments.

**Legal basis of processing.** The legal basis for processing personal data is the contract between the passengers and HotSpotSystem.

**External data processors.** Personal data is controlled by third parties in case passengers are using online payments. Such data is submitted to:

Adyen B.V.

Simon Carmiggeltstraat 6-50, 1011 DJ in Amsterdam, the Netherlands.

PayPal (Europe) S.à r.l. et Cie, S.C.A.

22-24 Boulevard Royal, L-2449 Luxembourg.

## **Data Subject Rights**

Data subjects may exercise certain rights regarding their data controlled by RebelRoam.

- Access personal data. Data subjects have the right to obtain disclosure regarding certain aspects of the processing and obtain a copy of the data undergoing processing.
- Verify and seek rectification. Data subjects have the right to verify the accuracy of the data and ask for it to be updated or corrected.
- Restrict the processing of their data. Data subjects have the right, under certain circumstances, to restrict the processing of data.
- Personal data deletion. Data subjects have the right, under certain circumstances, to obtain the erasure of data from RebelRoam.
- Data portability. Data subjects have the right to receive their data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller.
- Lodge a complaint. Data subjects have the right to bring a claim before competent data protection authority. The supervisory authority regards to our data processing activities is the Estonian Data Protection Inspectorate ([www.aki.ee](http://www.aki.ee)) which can be contacted by email at [info@aki.ee](mailto:info@aki.ee).