

Privacy policy

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Tweggo Networks Limited, a private company limited registered in Kenya under registration number PVT-Q7U757JP, having its registered office at Nairobi, ("**Tweggo**" or "**we/us/our**") operates/or provides a car sharing and on-demand car rental marketplace/Platform intended to facilitate contact between Car Owners and Renters.

We are fully aware of the importance of your privacy, and we implement data protection rules seriously. Our main goal is to assure you a smooth and safe online experience while using our Platform. This privacy policy ("**Privacy Policy**") informs you about how we collect, store and process your Personal Data (as defined below).

We invite you to carefully read our Privacy Policy that supplements the Tweggo Terms of Use & Service and the Tweggo Cookie Policy.

All capitalized terms have the same meaning as defined in the Terms and/or the Cookie Policy.

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1. When and what Personal Data do we collect from you?

Personal Data covers any information:

- relating to an identified or identifiable natural person (e.g. your name, your address,..);
- allowing us to identify you directly or indirectly, in particular by reference to an identification number (e.g. your IP address).

“**Personal Data**” includes both the data that you provide to Tweggo and the data collected by Tweggo via the use of Cookies, according to its Cookies Policy.

Your Personal Data will be collected and processed by Tweggo in the following circumstances:

1.1. When you create an Account on our Platform

You can create your Account directly on the Platform or via your Apple, Facebook or Google account. You will then need to submit the following Personal Data to finalize your Account (the “**Account Data**”):

Mandatory

- Full name;
- Date and place of birth;
- Information of your driving license: *number, first issuance date and country of issuance*).
- Email address;
- Password;
- Telephone number;
- Postal address;
- If you register as a legal person for renting out your Vehicles: *the company name, registration number, VAT number and all the information above on the legal representative.*
- If you register as a legal person for renting Vehicles: *the list of your employee (full name), the copy of the company’s certificate, the identity card of the company’s legal representative.*

Optional:

- Profile picture;
- Biography;
- Twitter link;
- Linkedin link.

1.2. When you are surfing on our Platform

In addition to other Personal Data you may have already provided to us, when you are surfing on our Platform, Tweggo may collect the following Personal Data:

Server-Log-Files & Browsing Data (“ Website Data ”)	<ul style="list-style-type: none">● How you used the Platform, such as your search queries;● Your IP address;● Device-related event data that you use, such as crashes, your browser type and language, date and time of the request, and referring URL.
App Data	<ul style="list-style-type: none">● User-ID;● Android device ID or iOS IDFA;● IP-address;● Name of the operating system and version;● Country code;● Language;● Device name.

Cookies

The following cookies may be collected according to our Cookie Policy:

- Functional cookies
- Non-functional cookies: audience analysis cookies, performance cookies, advertising personalization and improvement cookies (optional)

1.3. When you rent out your Vehicle

In addition to other Personal Data we may have already collected, when you want to rent out your Vehicle you shall submit the following Personal Data:

Vehicle Data	<ul style="list-style-type: none">● Vehicle type and brand;● License plate numbers;● Address of the parking location;● Country and year of first registration; <ul style="list-style-type: none">● Date of the last technical inspection;● Details about the Vehicle (e.g. number of seats and doors, accessories, tank size, mileage, fuel type).
Car Owner Payment Data	<ul style="list-style-type: none">● Bank account details : <i>name of account owner and bank account numbers</i> <p>According to customer due diligence imposed by the financial and monetary code to Banking institutions and payment gateways such as Stripe, Tweggo will conduct an identity check of you when you have made a cumulative income of Kes. 1 Million through renting out Vehicles. In this case, you must send to Tweggo as soon as possible:</p> <ul style="list-style-type: none">● a valid copy of your identity documents;● a copy of the registration certificate of your Vehicle(s);● a proof of address dated less than 3 months

1.4. When you rent a Vehicle

In addition to other Personal Data we may have already collected, when you want to rent a Vehicle you shall submit the following Personal Data:

1.4.a. For the Vehicle booking

When you book a Vehicle you need to submit the following data : ("**Renter Payment Data**")

- First and last name of the cardholder;
- Details of the payment card: as soon as they are collected, they are immediately sent to our payment provider(s) Stripe or M-Pesa and Tweggo does not have the full information - only the first six and last two numbers of the credit card are held by Tweggo.

Renter's registered as a legal person will have to register their company's credit card so that employees registered on their Account can pay for their Rental with this credit card.

1.4.b. For your identity verification

- ❖ For all Renters who don't have a Bank Account/or Card in Kenya and for all Renters who want to rent a Vehicle on Tweggo:

Given that Tweggo is responsible for verifying the identity of the Renter, you

shall submit in addition to other Personal Data you may have already provided to us, the following information taken via our App on your smartphone (the "**Vetting Data**"):

- Photo (front and back) of your driving license;
- Photo of your National I.D. Card or Passport.
- a live facial capture via Tweggo app.

If any of the Vetting Data is unclear or unsuitable, additional documents and/or information can be requested by us depending on why your identity verification was rejected (*e.g. copy of your identity document (I.D. card or passport), a selfie with your identity document and/or your driving license, copy of your residence permit and/or visa, copy of your student card,, your proof of residence,, copy of your credit card but only the full cardholder name and the first 6 and last 2 numbers of the credit card, the rest of the information should be blurred*). In case of suspected fraud, via the App, Tweggo may ask you to take a selfie in front of the rented Vehicle equipped with a Connect Device before starting the check-in process.

If you request the removal of your Vetting Data, you can no longer rent a Vehicle on our Platform.

1.4.c. For the smooth running of your Rental

We may collect Personal Data during your Rental since all Vehicles are equipped with a Connect Device and/or a Dashcam

→ Getaround Connect Data

The Tweggo Connect technology implies the installation of a telematic device in the Vehicle during onboarding of the vehicle. The Connect Device only collects and transmits to Tweggo the Vehicle's data that are necessary for the smooth running of your Rental with the Tweggo Connect technology. That information is essentially linked to the Vehicle itself (ignition status, fuel level, mileage...) to enable applied potential fees and compensation to the Renter and/or compensation for the Car Owner.

In addition, the Tweggo Connect technology enables us to geolocate the Vehicle:

- one (1) hour before the start of the Rental and at the end: to inform you where the Vehicle is and find out where it has been returned. This data enables us to organize the following Rental and verify that the Vehicle was returned to the requested area (if not, penalties will be applied);
- during Rental: if an issue arises preventing its operation (*e.g. Connect Device malfunction difficulties opening/closing the Vehicle*). In that case, an automatic alert is sent out by the Connect Device to Tweggo with the identification of the malfunction and the location to enable Tweggo to propose a workaround solution (including finding another Vehicle nearby) and to

enable Roadside Assistance to locate the Vehicle. Such data is kept for 3 months following the end of the Rental.

→ **Dashcam Data (Optional)**

Tweggo may install in the Vehicle and list on the Platform a Vehicle natively equipped with a Dashcam (i.e. a dash camera filming the front of the Vehicle and potentially the inside of the Vehicle). Tweggo is responsible for the processing of Renter Personal Data.

Records are only kept in the event of an incident and may be shared with our Insurance Partners to ensure claims are processed efficiently and to protect users from being liable for undue third-party claims.

We undertake to delete these records within 30 days of the end of the Rental concerned and not to disclose any of these records to third parties who are not qualified to receive them.

To exercise their rights about Personal Data, Renters should contact Tweggo for clarity.

1.5. When you apply at Tweggo

Tweggo collects the following Personal Data about candidates who apply at Tweggo:

- Name and surname;
- Postal address;
- Email address;
- Resume;
- University education;
- Professional qualification;
- Previous employment;
- And any other details you might have given us.

2. Why do we handle your Personal Data and on what legal basis?

We handle your Personal Data for the following purposes and legal basis:

Legal basis	Purposes
Contract	<ul style="list-style-type: none"> ● Rental management (<i>payment, rental agreement,...</i>); ● Penalties and fees management; ● Claims management (<i>damage assessment,...</i>); ● Outstanding debt management; ● Communication between Users; ● Send you an email to remind you of the possibility to leave a review about your Rental, the Car Owner/Renter and Tweggo on the Platform and/or trustpilot.com. ● Registration on the Platform; ● Verification of your identity (<u>article 1.4.b</u> above); ● Listing of a Vehicle on the Platform; ● Installation/deinstallation of the Connect Device;
Consent	<ul style="list-style-type: none"> ● Marketing & communication (<i>by email, notification on your smartphone</i>);

	<ul style="list-style-type: none"> ● Managing the Referral Program ● Call monitoring with our customer agent; ● Managing your job application; ● Audience analysis cookies as defined in the Cookie Policy; ● Performance cookies as defined in the Cookie Policy; ● Advertising personalization and improvement cookies as defined in the Cookie Policy ● Managing the exercise of your data protection rights; ● Managing the review;
Legitimate interest	<ul style="list-style-type: none"> ● Notify you of changes in our Terms, Privacy Policy and Cookie Policy; ● Exclusion from the Platform in case of fraud, misbehavior or debt: Users who commit fraud or fraud attempt (e.g. identity theft, card payment theft), who have an aggressive or strongly inappropriate behavior towards a Tweggo agent or another User, or who have an excessive debt towards Tweggo, are identified in an exclusion list to enable their identification in case of return on the Platform with a new account; ● Guarantee the reliability and security of the operations carried out via the Services offered on our Platform; ● Identify, delimit and remove malfunctions and errors in the telecommunication systems: to uncover any unlawful use of the telecommunication systems and services; ● To use functional cookies as defined in the Cookie Policy; <p>Tweggo hereby reserves the right to save and use the App Data and the Website Data afterwards if particular indications become apparent to us (e.g. Users using a rented Vehicle(s) and/or our Service for illegal use).</p>
Legal obligations	<ul style="list-style-type: none"> ● Respond to official requests from public or judicial authorities empowered to do so (e.g. request of financial administrator); ● Comply with the banking and financial regulations (e.g. security measures, identity verification) to avoid abuse and fraud. ● Legal prescription

3. How long is your Personal Data stored?

3.1. We only store in our active base (*i.e. base in which your Personal Data are accessible in the immediate working environment for the operational services in charge of this processing*) your Personal Data for as long as is necessary to achieve the purpose for which your Personal Data was collected.

Your Personal Data are stored in our active base for the following duration:

- 25 months for the Personal Data collected via our Cookies.
- 2 years following the last contact with the unsuccessful candidates for recruitment if they accept to be contacted by us for future opportunities. Otherwise, their Personal Data will be automatically archived.
- 2 years following your last action in relation with our Platform (*e.g. logging in our Platform, clicking on a link in an email,...*);

3.2. At the end of these periods, all your Personal Data will be automatically transferred to our archive base (*i.e. your Personal Data may only be consulted on an ad hoc basis by specifically authorized Tweggo employees in some specific circumstances*).

Your Personal Data are stored in our archive base for the following duration: (the following periods include the time the data was stored in the active base as per Article 3.1 above)

- for the time necessary to cover the applicable limitation periods to which we are exposed during our activity:
 - until 6 months have passed since the creation of the account;
 - until 13 months have passed since the last card payment;
 - until 5 years have passed since the reception of your application for unsuccessful candidates for recruitment;
 - until 5 years have passed since the creation of your debt or since your last payment date;
 - until 6 years have passed since your last Rental carried out (canceled Rentals are excluded). If the Car Owner sends to Tweggo a video taken by the Dashcam following a damage, the video is kept for the same duration;
- for security reasons to protect our Users' and Tweggo's interests until 6 years have passed since the restriction of your Account.

If your Account falls in multiple categories, we will select the furthest date.

Once these periods have elapsed, we delete your Personal Data (through anonymization).

3.3. At any time when your Personal Data is in the active base or archive base, if you withdraw the consent you have given us to process your Personal Data or if you request the deletion of your Personal Data, your Personal Data will be deleted but if you fall into any of the cases indicated in article 3.2 above, it will be placed in our archive base and deleted only at the end of the periods mentioned in said article.

4. What data security measures does Tweggo implement?

The access to your Account is only possible after entering your personal password directly or through autologin processes or through Facebook or Google Connect. Before storage, the passwords are hashed using state of the art practices and algorithms. You should always treat your access information confidentially and close the browser window once you have ended your communication with us, particularly if you share the use of the computer and/or device with others.

We employ efficient technical and organizational measures in order to safeguard the Service and other systems against loss, destruction, access, changes or the distribution of your Personal Data by unauthorized persons. The data transfer between the Platform and the server is [SSL] encrypted.

The Renter Payment Data and Car Owner Payment Data will be processed and stored by our payment providers (Stripe, and/or M-Pesa) according to the highest safety measures applicable in the e-commerce sector. Notably, the transaction will be made through a secured and encrypted process and part of the credit card number used will be hidden during its display on screen. We do not store the full credit card details, only the first and last numbers of the credit card are held by Tweggo.

5. Does Tweggo transfer your Personal Data?

Before transferring your Personal Data, we take measures to ensure that your Personal Data is treated with adequate protection as required by data protection laws and Tweggo's internal policies.

In addition, Tweggo seeks guarantees from its service providers acting as data processors under the ODPK on their compliance with the rules set out in the ODPK.

The other Personal Data that Tweggo may collect can be transferred to service providers outside the Kenya. For these cases, specific safeguards have been established with each of our service providers to ensure that your Personal Data is transferred and stored in a secure manner and in compliance with the applicable data protection regulations. You can ask Tweggo for a copy of these safeguards at any time.

Regarding the User Personal Data to which you may have access (e.g. the identity of the Car Owner or Renter, the photo of the identity card and driving license,...), you undertake not to use them for any purpose other than those described in the Privacy Policy and in the Terms. In the event that a User uses Personal Data for another purpose (such as but not limited to commercial, marketing, profiling purposes and/or to disclose such Personal Data to third party who are not qualified to receive them), Tweggo reserves the right to permanently restrict the Account of this User, without prejudice to Tweggo's right to take legal action to claim compensation for the damage suffered.

5.1. Users

<p>All our Users whether they are a Car Owner or Renter</p>	<p>For the smooth running of our Service, all our Users will have access to the Vehicle Data (<i>except for the information that do not appear in the Listing's photo</i>) and the following Personal Data of Car Owners and Renters (the "Public Data"): </p> <ul style="list-style-type: none">● Full name or user name or company, name of the Car Owner;● Profile picture (<i>if transmitted</i>);● Number of Rentals and evaluation(s) by other Users (<i>if applicable</i>);● Biography (<i>if fulfilled</i>);● Twitter link (<i>if transmitted</i>);● Linkedin link (<i>if transmitted</i>).
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<p>Car Owner</p>	<p>In addition to the Public Data, the Car Owner may have access to the following Personal Data of the Renter for the smooth running of the Rental to verify the Renter's identity at the start of the Rental (for paper and mobile Rental Agreements) and/or for any complaints at the end of the Rental (for all Rentals):</p> <ul style="list-style-type: none"> ● Full name; ● Date and place of birth (<i>checked visually when the Car Owner verifies the Renter's ID card at the start of the Rental</i>); ● Information of driving license (<i>i.e. number, first issuance date and country of issuance</i>); ● Telephone number; ● Postal address; ● Renter Payment Data. <p>(all these data are indicated on the Rentar profile except for the Renter's telephone number).</p> <p>This data may be accessible on the Car Owners Account. For professional Car Owners authorized by Tweggo, this data may also be accessible via an API. The purpose is to help them manage their Rentals and its direct consequences.</p>
<p>Renter</p>	<p>For the smooth running of our Service, in addition to the Public Data, the Renter may have access to the following Personal Data of the Car Owner who owned the Vehicle rented:</p> <ul style="list-style-type: none"> ● Car Owner's telephone number; ● Vehicle type and brand, license plate number and type of fuel (these data are indicated on the Rental Agreement).

5.2. Third Parties

<p>Contractual service providers for the smooth running of the Platform</p>	<p>Our contractual service providers are responsible for:</p> <ul style="list-style-type: none"> - Letting our Platform be run and hosted on remote servers; - Enabling the provision of the Service via third-party software tools (<i>e.g. through integration with our APIs</i>). <p>These service providers only have access to Personal Data to run such technical services.</p>
<p>Contractual service providers for the smooth running of your Rental (customer support,...)</p>	<p>Our contractual service providers are responsible for:</p> <ul style="list-style-type: none"> - Verifying the Users' identity and that they comply with the Terms (<i>i.e. driving license, credit check</i>); - Carrying out technical checks to validate the Vehicles' condition; - Processing claims or disputes related to Rentals; - Providing payment services. <p>They only have access to your Personal Data that are necessary for the execution of their services which include:</p>

	<ul style="list-style-type: none"> - Account Data; - Vetting Data; - App Data; - Vehicle Data; - Renter and Car Owner Payment Data; - Tweggo Connect Data; - Website Data; - Messages exchanged via our Platform.
<p>Insurance See Tweggo's Approved Insurance partner(s) listed on our Website</p> <p>Third party insurance (if applicable)</p>	<p>If an incident (<i>eg. damage, breakdown,...</i>) occurs during the Rental, the following Personal Data may be shared with them :</p> <ul style="list-style-type: none"> - Renter Data including Renter Payment Data; - Car Owner Data including Car Owner Payment Data; - Vehicle Data; - Documents relating to the damage such as photos, quotes, reports. <p>In case of an accident with a third party, our Insurance Partner(s) may send some of your Personal Data listed above to the third party's insurance.</p>
<p>Legal authorities</p>	<p>In accordance with prevailing legal provisions, Tweggo may be required to provide information to criminal prosecution authorities and courts for prosecution purposes.</p> <p>In such situations, Tweggo will send the Personal Data requested without notifying you.</p>

6. What rights do you have and how can you use them?

You may exercise the following rights attached to your Personal Data:

- Right to access: to access any Personal Data we hold on you;
- Right to rectify: to change inaccurate or incomplete information about yourself;
- Right to erasure: to request the deletion of one or more of your Personal Data;
- Right to restriction of processing; to request that Tweggo temporarily stop using some of your Personal Data.
- Right to data portability: to transfer to another service all or some of your Personal Data that you provided on our Platform and whose legal basis is the Contract or Consent
- Right to object: to stop receiving commercial/marketing communication.

To exercise any of these rights (except for your right to rectify and right to object which you can directly do via your Account), you can email us on support@tweggoapp.com. We will respond within a maximum of one (1) month following the receipt of your email.

For any questions about your Personal Data, you can contact us at the following address:
info@tweggoapp.com.

You also have the possibility to file a complaint with the Office of the Data Protection Agency Kenya (ODPK).