



curbFlow Privacy Principles

curbFlow allows cities to digitally manage their curbspace by dynamically allocating curbside access in real time to vehicle operators. On curbFlow's platform, cities and communities enjoy greater curbs allocation access; greater safety for drivers, passengers, bicyclists, other riders, and pedestrians; less congestion; less pollution; and a new source of public finance from capturing the value of city curbs. In addition to providing these community benefits, **curbFlow is also committed to safeguarding the personal privacy of all those who access our platform.**

- curbFlow **is aggregating and anonymizing data** about public curbs usage to ensure that curbs are accessed safely, efficiently, and fairly.
- curbFlow **is not collecting information** from users that contain sensitive, personally identifiable information about riders and/or deliveries, such as credit card numbers, social security numbers, home addresses, dates of birth, etc.
- curbFlow **is not using** facial recognition or other similar surveillance technologies.

Limiting Collection and Retention of Personal Information

Users have a right to expect that curbFlow will collect, use, and disclose personal data in ways that are consistent with the context in which they provide curbFlow such access, and for reasonable limits on the personal data that curbFlow collects and retains.

Unless required by law to do otherwise, curbFlow will limit collection, use, and disclosure of personal data to purposes that are consistent with its business operations. Unless required by law to do otherwise, we will secure or anonymize personal data.

Security

Users have a right to secure and responsible handling of personal data.



curbFlow will assess privacy and security risks and maintain reasonable safeguards to control risks such as loss; unauthorized access, use, destruction, or modification; and improper disclosure. We will perform regular risk assessments and compliance reviews to ensure those assessed risks are addressed.

Transparency

Users have a right to easily understandable and readily accessible information about privacy practices.

At times and under circumstances most useful to enable users to gain meaningful understanding of privacy risks, curbFlow will provide clear descriptions of what personal data we collect, why we need the data, how we will use it, when we will delete or anonymize it, and whether and for what purposes we may share personal data with third parties.

Accountability

Users have a right to have personal data handled by curbFlow with appropriate measures in place to assure they adhere to applicable federal, state, and local laws and regulations.

In the case of a breach, curbFlow will, amongst other measures, notify users as quickly as possible.

Ongoing Development of Best Practices

Users have a right to expect and trust that curbFlow's stewardship of personal data is informed by best practices on behalf of people and communities.

curbFlow will make data-driven decisions about our policies and in our product development to promote fair access to the opportunities and services that we deliver.



curbFlow Privacy FAQs

FAQ	Answer
Who is curbFlow?	curbFlow is the air traffic control center for city curbside space. The company's platform allows commercial vehicle operators (e.g. UPS, Uber) to make real time reservations at the curbside for pickups & dropoffs of passengers, parcels and deliveries. The company solves the vehicle congestion, safety and access issues both cities and operators have struggled with since the proliferation of on-demand services.
What are you doing in Washington, D.C.?	We are piloting our curbside management platform with the District Department of Transportation to evaluate opportunities to reduce congestion, improve curbside productivity and utilization, improve driver and pedestrian safety, and improve equity. We will then communicate to DDOT and other stakeholders the learnings, methods, and technologies that can be applied more broadly.
What data are you collecting?	We collect observational and statistical street and curbside data related to safety, utilization, productivity, and equity.
How are you collecting data?	At curbFlow locations, we have curbFlow-employed Curb Ambassadors on site from 9am - 9pm collecting data on company tablets.
Are you using public resources to help you collect data?	No. curbFlow is bearing all operating expenses, including the cost of hardware, software, installation, and personnel.
Who owns the data?	curbFlow.
Is the data encrypted?	All data is encrypted per industry standard. We use Transport Layer Security (TSL) / Secure Socket Layer (SSL) when transmitting data through the Internet, and AES-256 encryption algorithm when the data is at rest.



curbFlow's Privacy Policy

[insert principles from above]

Information Collected and Used by curbFlow

As you browse our website, information may be collected and stored related to your visit. For example, client IP address and browser type. We use this information to help curbFlow better serve the visitors of our website, and improve the website itself. curbFlow may monitor and store statistics such as how many people visit our website, which pages people visit on our website, and which browsers they use to do so.

curbFlow recognizes the need of visitors to our website for reasonable control of their personally identifiable information. The term "personally identifiable information" as used herein refers to any information associated with a visitor's name or identity. curbFlow uses this information to better understand the general needs of visitors and to provide visitors with better service. To help curbFlow improve the experience of visitors, curbFlow might also track how visitors, in general, use the website.

If you are asked to provide personal information to subscribe to a service offered on our website, or to receive information, we may use such personally identifiable information as we would use the same information obtained in a traditional non-electronic manner. Employees of curbFlow who receive and process such requests are responsible for safeguarding individual customer communications and information.

Links to External Websites

Our site may contain links to other websites not connected to curbFlow. Please be aware that curbFlow is not responsible for the privacy practices of other websites. We encourage users to be aware when they leave our website and to read the privacy statements of any website that collects personal information. This privacy policy applies solely to the information collected by this website.

Protecting the Confidentiality and Security of Information

We maintain generally accepted industry standards for physical, electronic, and procedural safeguards to protect the nonpublic personal information we have collected about you. We follow generally accepted industry standards to protect your personal information both during transmission and in storage. curbFlow works to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information transmitted between your browser and our servers. We use strong AES 256-bit encryption to protect the information at-rest. It is important for you to protect against unauthorized access to your account password and to your computer.



Disclosing and Sharing Information

curbFlow obtains and uses personally identifiable information for business purposes only. curbFlow does not sell or disclose personally identifiable information obtained online to anyone outside of curbFlow unless: (a) you specifically authorize it; (b) disclosure is required or permitted by law and/or required by a regulator, court order, warrant or subpoena; requested by government officials with reasonable grounds to believe that the information is a communication of a computer trespasser; or (c) disclosure is deemed necessary by curbFlow, in its sole discretion, to protect the safety, rights or property of curbFlow or any other person or entity.

curbFlow may disclose personal information only to those of its employees and third-party organizations that (1) need to know such information in order to process it on curbFlow's behalf or to provide services as described above, and (2) have agreed not to disclose it to any other parties without curbFlow's consent. Some of those employees, contractors and affiliated organizations may be located outside of your home country; by using this site and/or completing a survey, you consent to the transfer of information to such individuals and organizations in order to accomplish these purposes.

We do not disclose nonpublic personal information about our customers to third parties, other than those acting on our behalf except as needed in the normal course of business or as required by law or regulatory authorities. In rare cases, we may be compelled by law or regulatory authorities to disclose information to third parties without your authorization.

However, in the course of business, we may hire third party individuals and organizations to help us make our services better. These third parties include but are not limited to our web host provider, SaaS providers such as email hosting services, payment processors, or outside contractors we hire to perform marketing, operations, maintenance, or assist us in providing internet and other services. We may also hire third parties to operate, maintain, repair, or otherwise improve or preserve our website or its underlying files or systems.

Data Residency and International Data Transfers

All information collected by curbFlow is primarily processed and stored in the United States. In some cases, our employees, contractors and affiliated organizations may be located outside of your home country. By using this site or our services, you consent to the transfer of information to such individuals and organizations in order to accomplish the purposes cited in this policy.

What Choices Do I Have?



As discussed above, you can always choose not to provide information. However, doing so may make it difficult or impossible to take advantage of certain features of our website. You have the right to obtain access to certain information we have about you. Further, you have the right to request such information be corrected if you feel it is inaccurate. If you have any questions or would like additional information regarding our firm and your privacy or if you would like to request a copy of our privacy policy or obtain access to your information, please contact us.

Cookies and Other Tracking Technologies?

Cookies are identifiers in the form of small file containing a string of characters that is sent to your computer when you visit a website. curbFlow and our partners may use cookies to enhance the user's experience, track analytics, or provide services when visiting our website. We may also use cookies to remember user preferences or automatically log users in on subsequent visits. If you reject cookies you may still use our website, however, some functionality or features may be limited. The "Help" portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies; how to have the browser notify you when you receive a new cookie; or how to disable cookies altogether.

Electronic Communications

When you visit our website, or send e-mails to curbFlow, you are communicating with us electronically. By this action, you consent to receive communications from us electronically. You agree that all agreements, notices, disclosures and other communications that we provide to you electronically satisfy any legal requirement that such communications be in writing.

Your Account

If you use our website, you are responsible for maintaining the confidentiality of your account and password, and for restricting access to your computer. In addition, you agree to accept responsibility for all activities that occur under your account or password. curbFlow reserves the right to refuse services, to terminate accounts, or to remove or edit content at its sole discretion.

Conditions of Use, Notices, and Revisions

If you choose to visit our website your visit, and any dispute over privacy, is subject to this Privacy Notice and our Terms & Conditions, including limitations on damages, arbitration of disputes, and application of the law of the State of California without giving effect to any principles of conflicts of law.

Changes To This Policy

Our business changes constantly, and our Privacy Notice and the Terms of Service will also change. You should check our website frequently to see any recent changes.



Unless stated otherwise, our current Privacy Notice and Terms of Service apply to all information that we have about you and your account.

Children's Privacy

The privacy and protection of children is of great importance to us. We will not knowingly collect, use, or disclose personal information from children under the age of 18 without obtaining consent from a parent or legal guardian, except as otherwise permitted by law.

Contacting curbFlow

Please feel free to contact us if you have any questions about this policy or our privacy practices. You may contact us at hello@curbflow.com.

When was this policy last updated?

This privacy policy is effective as of today and was last updated on June 14, 2019.