



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 carbon emissions; 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 and efficiently.
- curbFlow **is not collecting information** from drivers 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.
- curbFlow **is not collecting any audio data.**
- curbFlow **will not share its data with law enforcement** except subject to enforcing parking violations, a legal process or an enforceable governmental request.

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.

Access to Enforce Any Legal Obligation(s)

curbFlow may share personal information with companies, organizations or individuals outside of curbFlow if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, legal process or enforceable government request.
- enforce applicable Terms of Service, including investigation of potential violations.
- detect, prevent, or otherwise address fraud, security or technical issues.
- protect against harm to the rights, property or safety of curbFlow, our users or the public as required or permitted by law.