

ROAM PRIVACY POLICY

Last Updated: May 8, 2025

This Privacy Notice (the “**Notice**”) only applies to the collection and use of personally identifiable information (the “**Personal Information**”) gathered through the use of the website (the “**Roam Website**”) that is owned and operated by Curbo Inc. This Notice does not apply to any subdomain of the website that is owned and/or operated by or on behalf of any third party and/or an affiliate or related company to Curbo Inc. even if we provide a link to such subdomain.

Curbo Inc. DBA Roam (“us”, “our” or “we”) is committed to protecting your privacy in this Notice: ‘we’, ‘our’, or ‘us’, refers to Curbo Inc. DBA Roam and its subsidiaries and affiliates. The Notice (i) describes the Personal Information that we may collect through the Roam Website <https://roam.auto/>, websites webpages, social media pages, and electronic communications from which it is linked or on which it appears (collectively, the “**Services**”). (i) explains the purpose of collecting and the use of such Personal Information, and (ii) explains how and when we may share it.

Please note that different or additional terms – including, but not limited to, the Subscription Agreement that governs your use of our vehicle service (the “**Program**”) – may apply to specific services or features offered on the Service or specific uses of the Service (“**Specific Agreements**”). This Privacy Policy applies to all users and visitors of our Services, including the individuals who have been approved by Roam to participate in the Program and have accepted this Agreement by clicking “Accept” on the “Accept terms and conditions” page of the Website (“**Subscribers**”).

ACCOUNTABILITY

We are responsible for all Personal Information under our control, whether supplied to us directly by you or by a third party or that we have provided to a third party for processing. We have established policies and procedures to comply with our Notice and have designated a Privacy Officer who is responsible for ensuring we comply with applicable privacy legislation. If you need to contact our Privacy Officer regarding your specific privacy questions or concerns, please see the contact information at the end of the Notice.

LIMITING COLLECTION

The collection of Personal Information by Roam is limited to only what is needed for the purposes identified by us below. Personal Information is collected by fair and lawful means only.

IDENTIFYING PURPOSE

Roam collects your Personal Information directly from you, and through third party sources with your consent. We do so for the following purposes:

- to provide and operate our Services and Program;
- to comply with our legal obligations, including detecting and preventing fraud, spam, abuse, security incidents and other illegal or harmful activity, and to conduct risk and security assessments;
- to process your applications and transactions, and to verify information you provide to us, including background and other checks as permitted by applicable law;
- to ensure compliance with this Notice, our Website, Terms of Service, the Subscription Agreement, and other agreements we have with you;
- to communicate with you for transactional purposes (for example, we might contact you about your Subscription or this Notice);
- to improve our services, for example, by using your Personal Information to customize your experience with us;
- for the security of the services and our company, our customers, and other third parties;
- for our marketing purposes, to send you information about new features on the Services, new services we offer, to serve you ads, and to tell you about opportunities available through us or information we think you might find interesting;
- offering and providing insurance products and services to meet your needs;
- establishing and maintaining communications with you through varied media platforms;
- verifying Personal Information provided in your application which may include a request for proof of identity;
- determining product offering prices;
- facilitating payment of fees and insurance premiums;
- investigating and settling claims;
- analyzing business results and compiling statistics;
- conducting market research;
- with your consent, to notify you or allowing our affiliated and/or related companies to notify you of certain products or services offered by us, or our affiliated and/or related companies;
- reporting to regulatory or industry entities;
- training employees and monitoring for quality assurance;
- to resolve any disputes and enforce our agreements with third parties; and
- for other purposes, as permitted by applicable law.

We may also use your Personal Information for other purposes with your consent or as permitted or required by law. If we require your Personal Information for any purpose other than as identified above, Roam will seek your consent before using it.

CONSENT TO COLLECTION OF PERSONAL INFORMATION

The Personal Information that we collect comes directly from you and/or through 3rd party data providers via the Roam Website or through other means of communication. We obtain your

consent electronically for the collection, use and disclosure of your Personal Information in accordance with this Notice, and, depending on the circumstances, for other purposes identified before the collection of your Personal Information.

Unless required by law, Roam will not collect, use or disclose Personal Information without obtaining your consent first. Your consent can be “implied” or “express”. Implied consent refers to conduct which demonstrates the voluntary provision of Personal Information, for example, when you provide Personal Information for an insurance quote. Express consent refers to circumstances where you are provided with explicit disclosure regarding the nature of the collection, use, and disclosure of your Personal Information.

Subject to certain legal, contractual restrictions, and reasonable notice, you may refuse or withdraw consent to the collection, use or disclosure of Personal Information at any time by contacting our Privacy Officer. Additionally, you may also opt out of certain communications we may send you regarding other products and services.

COLLECTION AND USE OF PERSONAL INFORMATION

The types of Personal Information that we may collect to fulfill the purposes identified above include:

Contact Information – If you submit an inquiry or apply to become a Subscriber, we may collect your contact, mailing and other information. This may include your name, email address, phone number, date of birth.

Financial Information – Certain components of our Services may require you to provide us with your payment or financial information including your credit card number, expiration date, security code, shipping address and billing address, which constitutes Personal Information. We, with support from our authorized service providers will only use your payment information to process your payments to provide you with the products or items you ordered through our Services.

Driver License numbers, Driving Records & Credit Scores. We may collect Personal Information from you to ensure your insurability as a Subscriber of our Program and your suitability for using our Services. Such Personal Information may include your driver license numbers, driving records or motor vehicle reports, and credit scores/reports.

Usage Information – We may also collect usage and device information when you visit our Services. This may include information about the browser, operating system, and/or device identifier for the device you are using, your internet service provider (“ISP”) and internet protocol (“IP”) information, your navigation activity on the Services, as well as the websites that you came from and the Services you visit when you leave.

Vehicle Reservation: When you reserve a vehicle and enter into a subscription agreement with

us, you will be asked to provide additional information that we need in order to confirm your eligibility for a subscription and deliver your vehicle. This information includes your phone number to contact you regarding your reservation, residential address where your vehicle will be delivered to, and payment card information. At the time your vehicle is delivered, we are required to view a form of address verification (for example, Utility Bill). We also collect a photo of the front and back of your driver's license and a selfie that you take of yourself in order to verify your identity and for anti-fraud purposes by comparing the image on your driver's licence to the selfie.

Background Verifications: In order to confirm your eligibility and suitability for a vehicle subscription we request your consent to obtain background information on you regarding motor vehicle reports (to screen for dangerous driving history, such as DUIs, speeding, red light violations), car insurance claims history (to screen for excessive fault claims) and a criminal record check. As part of this process, we may use a third party to verify your identity online by asking your security questions derived from your credit report.

Location Information: Our vehicles are equipped with global positioning satellite (GPS) technology which collects information regarding the location of the vehicle and transmits this information to us. We use this information to recover vehicles in the event of loss or theft and to enforce our agreements with you (including to ensure that vehicles are not driven out of the province/country). Disabling, disconnecting or destroying any such technology device or equipment is strictly prohibited.

Communications: If you sign-up to receive email marketing communications such as newsletters or blog posts, we collect your email address. You can unsubscribe at any time by clicking the "unsubscribe" link included at the bottom of each email. Alternatively, you can opt out of receiving email marketing communications by contacting us at the contact information provided in the "Contact Us" section below. Please note that you may continue to receive transactional or account-related communications from us.

Contact Us: When you contact us with a comment, question or complaint, you may be asked for information that identifies you, such as your name and email, along with additional information we need to help us promptly answer your question or respond to your comment. We may retain this information to assist you in the future.

SHARING OF PERSONAL INFORMATION

We do not sell, rent or disclose your Personal Information to third parties without your consent, except as described below or as required or permitted by applicable law.

Background Verifications: As described above, we may obtain your consent to disclose your information with third parties for background screening purposes, including to provincial police services, provincial ministry of transportation and third parties.

Service Providers: Your Personal Information may be transferred (or otherwise made available) to third parties that provide services on our behalf. We use service providers to provide services such as conducting background verifications, verifying identity, hosting the Website and providing marketing and advertising services. Our service providers are only provided with the information they need to perform their designated functions and are not authorized to use or disclose Personal Information for their own marketing or other purposes. Our service providers may be located in the U.S., Canada or other foreign jurisdictions.

Legal/Compliance: We and our Canadian, US and other service providers may disclose your Personal Information in response to a search warrant or other legally valid inquiry or order (which may include lawful access by Canadian, US or other foreign governmental authorities, courts or law enforcement agencies), to other organizations in the case of investigating a breach of an agreement or contravention of law or detecting, suppressing or preventing fraud or as otherwise required or permitted by applicable Canadian, US or other law. Your Personal Information may also be disclosed where necessary for the establishment, exercise or defence of legal claims and to investigate or prevent actual or suspect loss or harm to persons or property.

Sale of Business: We may transfer any information we have about you as an asset in connection with a proposed or completed merger, acquisition or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of Curbo or as part of a corporate reorganization or other change in corporate control.

INFORMATION ABOUT OUR WEBSITE

Visiting our Website: In general, you can visit our Website without telling us who you are or submitting any personal information. However, we collect the IP (Internet protocol) addresses of all visitors to our Website and other related information such as page requests, browser type, operating system and average time spent on our Website. We use this information to help us understand our Website activity and to monitor and improve our Website.

Cookies: Our Website uses a technology called “cookies”. A cookie is a small file of information that our Website sends to a user’s browser, which may then be stored on the user’s hard drive so that we can recognize the user’s computer or device when they return. You may set your browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from our Website, you may not be able to take advantage of all of the Website features.

Analytics: We may use a third party such as Google Analytics to help us gather and analyze information about the areas visited on the Website (such as the pages most read, time spent, search terms and other engagement data) in order to evaluate and improve the user experience and the Website. These third parties may use cookies and other tracking technologies. For more information about Google Analytics or to prevent the storage and processing of this data (including your IP address) by Google, you can download and install the browser plug-in

available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>. You can also obtain additional information on Google Analytics' data privacy and security at the following links:

- <https://policies.google.com/technologies/partner-sites> and
- <https://support.google.com/analytics/topic/2919631>

THIRD PARTY LINKS

Our Website may contain links to other websites that Roam does not own or operate (excluding chaser websites). We provide links to third party websites as a convenience to the user. These links are not intended as an endorsement of or referral to the linked

websites. The linked websites have separate and independent privacy policies, notices and terms of use. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat Personal Information. We encourage you to read the privacy policy of every website you visit.

SAFEGUARDS

We have implemented reasonable administrative, technical and physical measures in an effort to safeguard the Personal Information in our custody and control against theft, loss and unauthorized access, use, modification and disclosure. We restrict access to Personal Information on a need-to-know basis to employees and authorized service providers who require access to fulfil their job requirements.

Protecting your Personal Information is very important to us, so we have taken the necessary organizational, technological and physical safeguards to protect it. When you submit sensitive information via the Website, your information will be protected both on and offline.

Wherever we collect sensitive information, that information is encrypted and transmitted securely. You can verify this by looking for a lock icon in the address bar and looking for "https" at the beginning of the address of the Web page.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, customer service) are granted access to your Personal Information. The computers and servers in which we store personally identifiable information are kept in a secure environment.

LIMITING USE, DISCLOSURE, AND RETENTION

Unless you consent otherwise, or required by law, Personal Information can only be used or disclosed by us for the purposes for which it was collected. We keep Personal Information only as long as required to serve those purposes.

Personal Information that is no longer required to fulfil the identified purposes is destroyed, erased or made anonymous. We have developed and implemented detailed retention principles and will ensure the destruction, or anonymization of Personal Information in a method that prevents improper access.

There are situations specific to our business where we will use, disclose and retain Personal Information as dictated by prudent business practices. Examples of these situations include:

- Storage of information: transfer of Personal Information to cloud providers;
- Regulatory: compliance with legal, audit and other regulatory or governmental regulations.

We may internally share your Personal Information for the purposes identified in this Notice with its employees, affiliates or other related companies outside of Canada. Only such companies with legitimate business reasons will have access to your Personal Information and must ensure that Personal Information in their possession is held securely. We may also use service providers located outside of Canada to collect, use, disclose or store Personal Information. Where we do so, we will contractually require such third parties to employ the appropriate security safeguards to protect your Personal Information, subject to the law in the third party jurisdiction. While the Personal Information is in another jurisdiction it may be accessed by the courts, law enforcement and national security authorities of that jurisdiction. The jurisdictions where Personal Information may be collected, used, disclosed and stored include the United States of America. To obtain further information about our policies and practices with respect to privacy, you may contact our Privacy Officer as indicated below.

We may transfer any Personal Information that we have about you in connection with a merger or sale involving all or part of our business or as part of a corporate reorganization or stock sale or other change in corporate control.

ACCURACY

We try to ensure that the Personal Information we collect is accurate, complete, and as up-to-date as possible to properly satisfy the purposes for which it is to be used. If we are unable to verify your Personal Information or contact you, we may be limited in our ability to provide you with our services.

OPENNESS

Upon request, Roam will explain its Notice concerning the management of Personal Information.

You can contact our Privacy Officer with any inquiries or complaints or if you require further information.

INDIVIDUAL ACCESS

If you would like to obtain a copy of the Personal Information held about you by us, or update, correct, or delete any Personal Information that you have provided to us through your use of the Roam Website, or otherwise, or if you have any questions or suggestions for improving this Privacy Notice, please contact us. If you have questions about unsubscribing from email or other communications, do so by using the email below in the Contact Us section. We may only deny access to your Personal Information when such denial is: (1) required or authorized by law; (2) when granting you access would have an unreasonable impact on other people's privacy, unless the requested information is severable from the Personal Information of other people; and (3) to protect our confidential commercial information. If we deny your request for access to or refuse a request to correct information, we shall explain why.

CHALLENGING COMPLIANCE

Any individual may address a written challenge concerning our compliance with this Privacy Notice to our Privacy Officer at the contact information found at the end of this Notice. Roam will investigate all written complaints. Should we find that a complaint has reasonable grounds, we will take all appropriate steps to correct the Personal Information and amend the Notice or practice as required and will notify the individual about the outcome.

CHANGING OUR PRIVACY AGREEMENT

From time to time, we may update or make amendments to the Notice to comply with any changes in legislation or to take into consideration any other issues that may arise. Should we make any changes, we will post the revised Notice on the Roam Website and/or provide you with a link or an email notification. We encourage you to check back often and keep yourself informed about our Notice. As we continue to serve you and where changes have been made to this Notice, our continued business relationship constitutes acceptance of those changes.

YOUR CHOICES

As indicated above, if you have signed-up to receive our email communications, you can unsubscribe any time by clicking the "unsubscribe" link included at the bottom of the email. Alternatively, you can opt-out of receiving our marketing communications by contacting us at the contact information under "Contact Us" below.

ACCESS TO INFORMATION

Subject to limited exceptions under applicable law, you have the right to access, update and correct inaccuracies in your Personal Information in our custody and control. You may request access, updating and corrections of inaccuracies in your Personal Information in our custody or control by emailing or writing to us at the contact information set out below. We may request certain Personal Information for the purpose of verifying the identity of the individual seeking access to his or her Personal Information records.

CONTACT US

If you have any questions or comments about this Notice or the manner in which we or our service providers treat your Personal Information, or to request access to your Personal Information in our records, please contact us at privacy@roam.auto.