PRIVACY POLICY (INCLUDING U.S. ADDENDA)

Applies to DriverNest App and All Softvivor Platforms

Last Updated: January 15, 2026
Effective Date: January 15, 2026

This Privacy Policy describes how Softvivor LLC, and where applicable its affiliated entity operating the DriverNest mobile application, collectively Softvivor, we, us, or our, collect, use, disclose, retain, and protect personal information when you use our websites, mobile applications, and digital services, including TransferBid, Priofer, Tripfer, Medifer, Mopany, Agentfer, DriverNest, and TransferHelpdesk, collectively the Platform.

The Platform is provided on an as-is basis. This Privacy Policy addresses privacy and data handling practices only.

This Policy is designed, in particular for users in the United States, to align with applicable U.S. state privacy laws and related requirements, including the California Consumer Privacy Act and California Privacy Rights Act, collectively CCPA and CPRA, the Virginia Consumer Data Protection Act, the Colorado Privacy Act, the Connecticut Data Privacy Act, the Washington My Health My Data Act, and Fair Credit Reporting Act principles applicable to driver screenings. Rights and mechanisms may vary by state.

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1. ROLES, DEFINITIONS, AND CONTACT INFORMATION

1.1 Key Definitions

- Passenger means a customer or user who obtains transportation or related services through the Platform.
- Driver means an individual who provides services through the Platform.
- Fleet means a business entity managing one or more Drivers and vehicles providing services through the Platform.
- Visitor means an individual who visits or browses the Platform.
- Service Provider means a third party that processes personal information on our behalf to support the Platform, including infrastructure, payments, communications, analytics, security, and customer support.
- Sale or Share has the meaning used under California law and may include certain disclosures of personal information to third parties for targeted advertising, including cross-context behavioral advertising.
- Sensitive Personal Information includes categories defined as sensitive under CPRA and other applicable laws, including precise geolocation and certain government identifiers.

1.2 Corporate Structure and Processing Roles

- Primary responsible entity and Platform operator: Softvivor LLC, United States. Under California law, Softvivor generally acts as a Business.
- Technology partner and processing support: Softalya Ltd., Türkiye, providing software development, technical maintenance, and infrastructure services on behalf of Softvivor and generally acting as a Service Provider and or Processor, as applicable.
- Independent contractors: Drivers and Fleets operate as independent businesses and remain responsible for legal obligations arising from their own activities.

1.3 Contact

- Privacy email:contact@transferbid.com
- Address: [699 San Antonio Road, Palo Alto, CA 94306 — U.S
- Toll-free: +1 (650) 505-5770

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2. CALIFORNIA NOTICE AT COLLECTION, SUMMARY

Before collecting personal information, California law requires that we inform you of the categories of personal information we collect and the purposes for which we use them. The table below summarizes our notice.

Category of Personal Information	Examples	Primary Purposes	Sale or Share	Typical Retention
Identifiers	Name, email, phone, IP address, account identifiers	Account administration, reservations, communications, security	Generally no	Account term plus 7 years
Commercial Information	Reservation history, route, time, payment method	Service delivery, payments, refunds, accounting, dispute handling	Generally no	7 years
Precise Geolocation, Sensitive Personal Information	GPS location, route, match-time location	Matching, navigation, safety, ETA calculations	No	Service term and as required for safety and compliance
Internet or Network Activity	Device identifiers, cookies, screen or page interactions, crash logs	Security, performance, analytics, debugging	May be yes for targeted advertising	Up to 13 months for marketing identifiers

Category of Personal Information	Examples	Primary Purposes	Sale or Share	Typical Retention
Sensitive Personal Information for Drivers	SSN or ITIN, driver license number, background check reports	Identity verification, legal compliance, screening, payments	No	3 to 7 years as required by law
Driver Telematics	Acceleration, braking, cornering data	Safety monitoring, crash detection	No	1 to 7 years depending on incident

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3. PERSONAL INFORMATION WE COLLECT AND SOURCES

3.1 Information You Provide Directly

Passenger and Visitor information may include:

- Name, email address, phone number
- Reservation details and trip preferences
- Special requests and communications

Driver and Fleet information may include:

- Government identifiers and credentials needed to onboard and maintain eligibility, including driver license number and images of the front and back of the driver license
- Work authorization, vehicle registration, insurance documentation, and certificates of insurance for personal or commercial auto coverage
- Tax and regulatory documentation, including Form W-9 and similar documents, company type, company name, tax number, and related business identifiers
- Bank and payout information, including bank account number and routing number
- Location-related onboarding or compliance information where required
- Licensing and permitting documentation relevant to the jurisdiction of operation, including TCP class, TCP certificate or permit, and TCP permit number, where applicable
- Date of birth, profile photo, postal code, country, city, district, and address where necessary for identity, compliance, or operational needs

Support and communications:

- Call center recordings or logs, chat transcripts, emails, and other support communications

Password security:

- Passwords are not stored in plain text. We use appropriate security measures such as hashing and salting.

3.2 Information Collected Automatically

When you download, access, or use the App or Platform, we may collect:

- IP address
- Device information such as device model, operating system, and language
- App usage data such as screens or pages visited, time and date of access, time spent on specific screens or pages, and total time spent in the App
- Diagnostic and performance data such as crash logs and error reports
- Cookies and similar technologies on web properties, and advertising identifiers where applicable

Location information:

- Passenger location may be collected as precise geolocation only with permission, and approximate location may be derived from IP address.
- Driver location is generally required while Drivers are online and actively providing services.

Telematics and sensor data for Drivers:

- Limited telematics or sensor data may be collected for safety monitoring and crash detection.

3.3 Information Obtained From Third Parties

We may receive information from:

- Background check providers for Drivers, providing reports aligned with FCRA requirements
- Marketing and measurement partners, including advertising networks and attribution providers
- Referral sources when a user provides another person’s contact information as part of a referral program
- Payment processors and fraud prevention partners, to support payments and security

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4. HOW WE USE PERSONAL INFORMATION

We use personal information for the following purposes:

- Service delivery, including matching, navigation, dispatch, payment processing, receipts, and customer support
- Safety and security, including identity verification, fraud detection, risk prevention, and incident management

- Legal and regulatory compliance, including responding to lawful requests, maintaining records, and meeting tax requirements
- Product analytics and improvement, including performance monitoring, debugging, and improving ETA or operational accuracy
- Marketing and targeted advertising, where applicable, consistent with your choices and legal opt-in or opt-out mechanisms

We may contact you from time to time to provide important information, required notices, operational updates, and, where permitted, marketing promotions.

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5. LOCATION DATA AND GEOFENCING RESTRICTIONS, WASHINGTON MHMDA

Passenger controls:

- You can manage location permissions through device settings. You may be able to use the service by manually entering an address without sharing precise location.

Driver requirement:

- Drivers' location data is required while they are online and actively performing work due to the nature of the service.

Washington MHMDA commitment:

- We do not use geofencing around healthcare facilities such as hospitals, clinics, and reproductive health centers for the purpose of tracking, identifying consumers, or sending health-related advertising.

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6. DRIVER SCREENINGS AND FCRA

To support Platform safety, we may conduct screenings of Driver applicants and existing Drivers.

- Separate disclosure and authorization: We obtain explicit written authorization through a standalone document separate from this Privacy Policy.
- Adverse action process: If we may take an adverse action based on a report, we follow an FCRA-aligned process that includes a pre-adverse action notice, an opportunity to dispute, and a final adverse action notice.

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7. DISCLOSURE OF PERSONAL INFORMATION

7.1 Service Providers and Operational Partners

We may disclose personal information to Service Providers that help us operate the Platform, such as:

- Infrastructure and hosting providers
- Payment processors
- Communications providers
- Analytics, debugging, and performance monitoring providers
- Customer support and security vendors

Examples may include cloud infrastructure providers, payment processors, messaging providers, and application monitoring tools such as Sentry for crash reporting and diagnostics. The Platform may also rely on platform services such as Google Play Services on Android devices.

Service Providers are contractually restricted to using personal information only to provide services to us and are required to protect it.

7.2 Passenger and Driver Data Sharing, Minimum Necessary

To deliver the service, we share limited information:

- Shared with Drivers: Passenger name, pickup location, and where necessary a profile photo
- Shared with Passengers: Driver name, vehicle details, license plate, and live location during the trip
- Live location sharing ends when the trip is completed.

7.3 Advertising and California Sale or Share

We may disclose certain identifiers and internet or network activity information to third parties for targeted advertising. Under California law, this may constitute a Sale or Share. You can opt out as described in Section 9.

7.4 Legal, Safety, and Fraud-Related Disclosures

We may disclose personal information:

- To comply with a subpoena, court order, or similar legal process
- When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request
- To professional advisors such as auditors, insurers, and legal counsel as needed to provide services to us

7.5 De-identified and Aggregated Data

Where feasible, we may share de-identified or aggregated information with external services to support analytics, improve the Platform, and optimize offerings.

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8. DATA RETENTION

We retain personal information as long as necessary for the purposes described in this Policy and as required by law:

- Account data: for as long as your account is active, and typically for 7 years thereafter
- Reservation and transaction records: typically 7 years
- Driver qualification files: for the term of engagement and typically 3 years thereafter, or as required by applicable regulations
- Marketing identifiers such as cookies and similar technologies: up to 13 months
- Deletion requests: where there is no legal obligation to retain the information, we delete or anonymize it typically within 30 to 90 days
- Industry retention references, including longer periods that may be referenced by agencies, are treated as guidance only when relevant and do not extend retention unless legally required

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9. YOUR RIGHTS AND CHOICES, U.S. STATE PRIVACY RIGHTS

Depending on your state of residence, you may have the right to know or access, delete, correct, and opt out of certain processing, including Sale or Share and targeted advertising.

9.1 Do Not Sell or Share and Global Privacy Control

- You may opt out using the Do Not Sell or Share My Personal Information link available on our website and, where offered, within the App.
- We treat the Global Privacy Control browser signal as an opt-out request in California and other applicable states.

9.2 Sensitive Data Consent

In some states, we obtain affirmative express consent to process sensitive data such as precise geolocation. You may withdraw consent at any time through device settings or by contacting us.

9.3 Requests, Verification, and Appeals

You may submit requests through the Privacy Portal, email, or toll-free number. We may need to verify your identity before fulfilling a request. If we deny your request, we provide an appeal process where required by Virginia and Colorado law, and we will include appeal instructions in our response.

9.4 App Uninstall, Opt-Out of App Collection

You can stop collection of information by the App by uninstalling it using the standard uninstall process available on your device or through the application marketplace.

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10. DATA SECURITY

We use reasonable administrative, technical, and physical safeguards to protect personal information, including encryption in transit using TLS 1.2 or TLS 1.3, encryption at rest using AES-256, multi-factor authentication where appropriate, and access controls based on a need-to-know principle. No digital system can be guaranteed to be 100 percent secure.

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11. CHILDREN'S PRIVACY

Our services are not directed to children under 13, and we do not knowingly collect personal information from children under 13. If we discover that a child under 13 has provided personal information, we will delete it. Parents or guardians who believe a child has provided personal information may contact us at contact@drivernest.com or the privacy contact channels in Section 1.

For users under 16, any Sale or Share of personal information is permitted only with affirmative authorization where required by law.

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12. INTERNATIONAL DATA TRANSFERS

Due to our global structure, personal information may be transferred outside the United States for operational purposes, including to our technology partner Softalya Ltd. Such transfers are protected through appropriate legal safeguards, including standard contractual clauses where applicable and data processing agreements.

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13. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. We will notify you of changes by posting the updated Policy and updating the Last Updated and Effective Date above. Your continued use of the Platform after an update constitutes acceptance of the revised Policy to the extent permitted by law.

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14. YOUR CONSENT

By using the Platform, you consent to the collection, use, and disclosure of your information as described in this Privacy Policy, now and as amended.

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15. CONTACT US

If you have questions regarding privacy or our practices, you may contact us at:

- contact@transferbid com
- Toll-free +1 (650) 505-5770