

DRIVER PARTNER PRIVACY POLICY

For Driver Partners — Lalais App

YOUR PRIVACY MATTERS

This Privacy Policy explains what personal data Lalais collects about you as a Driver Partner, why we collect it, how we use and protect it, who we share it with, and what rights you have. It applies to the Lalais Driver Partner App and all related services. It should be read alongside your Driver Partner Agreement.

1. Who Controls Your Data

Your data is controlled by two related entities depending on the nature of the processing:

- Laiharee Lda (Timor-Leste) — your primary data controller for all operational matters including ride dispatch, performance management, compliance, earnings, and Driver Partner relations. Registered in the Democratic Republic of Timor-Leste with its registered office in Dili.
- Laiharee Group Pte Ltd (Singapore) — processes data relating to the operation of the Lalais technology platform and international card payment processing through Airwallex Pty Ltd.
- Laiharee Lda also processes data relating to local mobile payment transactions via TPAY (Telkomcel) and Mosan (Telemor) under its direct operator agreements.

For all privacy enquiries: info@lalais.app | Dili, Timor-Leste

2. What Data We Collect About You

2.1 Data You Provide During Onboarding and Registration

- Full legal name, date of birth, and national identity card or passport details.
- Mobile number and email address.
- Profile photograph meeting Lalais's standards.
- Driver's licence number, licence class, and expiry date.
- Vehicle registration details: make, model, year, colour, and registration number.
- CITV (vehicle roadworthiness certificate) details and expiry date.
- Motor vehicle insurance policy details and expiry date.
- Proof of residential address (utility bill or official document, issued within 3 months).
- Bank account or mobile money account details for earnings disbursement.
- Background check consent form and any information you provide in connection with the background check process.

2.2 Data Generated While You Use the Platform

- Location data: your real-time GPS coordinates are collected continuously while you are in Active Status (logged into the Driver Partner App as available for trips). Location data is also collected during each trip for navigation, safety, and fare calculation purposes.
- Trip data: for every trip you complete — pickup and drop-off locations, route taken, trip duration, fare charged, payment method used, and whether the trip was a cash or electronic payment trip.
- Earnings data: gross fare, commission deducted, cash commission balance, cash commission holdback amounts, net earnings paid, and payment cycle records.
- Performance data: your acceptance rate, cancellation rate, trip completion rate, and passenger ratings over time.
- App usage data: which features of the Driver Partner App you use, session times, and any error or crash reports.
- Device information: device type, operating system version, unique device identifier, and mobile network information.
- Communications: messages sent through in-app support, reports you file about passengers or incidents, and any correspondence with Lalais's support or compliance teams.

2.3 Data From Third Parties

- Background check results: criminal record information, traffic infringement history, and licence validity status obtained from approved background check providers and government databases.
- Payment confirmation: transaction status from Airwallex (card payments), Telkomcel (TPAY), or Telemor (Mosan) relating to passenger payments collected on your behalf.
- Passenger reports and ratings: feedback submitted by passengers after trips, including star ratings and written comments, which form part of your performance record.
- Insurance verification: confirmation of valid insurance coverage from your nominated insurer where we request this.

3. Why We Collect and Use Your Data

3.1 To Operate the Platform and Deliver Your Earnings

- To verify your identity and eligibility before activating your account.
- To match you with passenger trip requests based on your location and availability.
- To calculate your gross fare, deduct the applicable commission, apply cash commission holdback where relevant, and disburse your net earnings to your nominated account.
- To track your cash commission balance in real time and notify you when the \$15 payment threshold is reached.
- To provide you with earnings statements, trip history, and payment cycle records through the Partner App.

3.2 For Safety and Incident Management

- To monitor your location during Active Status and during trips, so passengers can track their ride and so Lalais can respond to safety incidents.
- To investigate complaints, incidents, and reports filed by passengers or by you.
- To share your trip details and location with emergency services or law enforcement where an incident requires it.
- To enforce the Driver Partner Agreement and Driver Code of Conduct, including investigating potential Disqualifying Conduct.

3.3 For Performance Management and Quality

- To calculate and display your passenger rating and trip statistics.
- To issue performance warnings, place you on improvement plans, or initiate deactivation proceedings where your performance falls below required thresholds.
- To send you communications about your account status, policy updates, and required actions (such as document renewals or app updates).

3.4 For Compliance and Legal Obligations

- To conduct and record background checks as required under our onboarding process and periodically during your time as a Driver Partner.
- To verify that your driver's licence, vehicle registration, CITV certificate, and insurance remain valid and have not expired.
- To maintain records required by Timorese law, including financial records for tax purposes.
- To respond to lawful requests from courts, regulators, police (PNTL), or other government authorities.

3.5 To Improve the Platform

- To analyse trip patterns, demand data, and platform usage to improve the service for Driver Partners and passengers.
- To develop new features and Driver Partner tools.

4. Location Data — Special Note

Location data is central to how the Lalais platform works for Driver Partners. We collect your GPS location continuously while you are in Active Status so we can dispatch trip requests to you based on proximity to passengers. During a trip, we collect your location to enable passenger tracking, calculate the fare, and maintain a trip record for safety purposes.

Location data collected during trips is retained for 90 days at full precision, after which it is anonymised. Aggregate and anonymised location data may be retained longer for operational planning purposes.

We do not share your real-time location with any third party other than the passenger whose trip you are currently completing, and law enforcement where legally required.

5. Background Check Data — Special Note

As part of the onboarding process, and periodically during your time as a Driver Partner, Lalais will conduct or commission background checks including criminal record checks and driving history checks. This data is treated with particular care:

- Background check results are accessed only by authorised Lalais compliance staff.
- Results are used solely to assess your eligibility to use the platform and your ongoing compliance with the Driver Partner Agreement.
- Background check data is retained for the duration of your Driver Partner relationship plus 3 years, after which it is securely deleted.
- You have the right to be informed of the outcome of any background check and to provide context or correction where you believe a result is inaccurate.

6. Earnings and Financial Data — Special Note

Your earnings data — including gross fares, commission deductions, cash commission balances, holdback amounts, and net earnings — is financial information that we handle with care. It is used to:

- Calculate and disburse your weekly or bi-weekly earnings.

- Maintain the running cash commission balance and apply holdbacks from electronic payment earnings where applicable.
- Provide you with earnings statements and trip-level breakdowns in the Partner App.
- Meet our financial record-keeping obligations under Timorese law (records retained for 7 years).

Your bank account or mobile money account details are used solely for the purpose of disbursing your earnings and are not shared with third parties other than the payment operator processing the disbursement.

7. Who We Share Your Data With

7.1 Passengers

When you accept a trip, the passenger sees your first name, profile photo, vehicle make, model, colour, and registration plate, and your star rating. Your mobile number is masked — calls go through the platform so the passenger cannot see your real number.

7.2 Payment Operators

For electronic passenger payments collected on your behalf: Airwallex (international card payments, under Laiharee Group Pte Ltd), Telkomcel (TPAY, under Laiharee Lda), and Telemor (Mosan, under Laiharee Lda). For disbursement of your net earnings: your nominated bank or mobile money operator. Each operator handles data under their own privacy practices and their agreements with us.

7.3 Background Check Providers

We share identifying information (name, date of birth, licence number) with approved third-party background check providers solely for the purpose of conducting checks you have consented to. Results are returned to Lalais and are not shared further.

7.4 Technology and Support Providers

We use trusted third-party vendors for cloud hosting, the Partner App infrastructure, customer support tools, and analytics. All vendors are contractually required to protect your data and use it only for the purpose we specify.

7.5 Law Enforcement and Regulatory Authorities

We may disclose your data — including your location, trip records, earnings data, and identity information — to PNTL, courts, government regulators, or other lawful authorities when we are required to do so by law, or where we reasonably believe disclosure is necessary to prevent serious harm or investigate a crime.

7.6 Business Transfers

If Laiharee Lda or Laiharee Group Pte Ltd is involved in a merger, acquisition, or sale of assets, your data may be transferred to the relevant acquiring entity. You will be notified if this happens and the incoming entity will be required to honour this Privacy Policy or provide you with a materially equivalent one.

We do not sell your personal data to third parties.

8. How Long We Keep Your Data

- Account and identity documents: for the duration of your Driver Partner relationship plus 5 years after deactivation or termination.
- Trip records: 7 years from the date of each trip (legal and tax compliance).
- Earnings and payment records: 7 years (financial regulatory requirement).
- Precise GPS location per trip: 90 days, then anonymised.
- Background check results: duration of Driver Partner relationship plus 3 years.

- Performance records (ratings, acceptance rates, warnings): duration of Driver Partner relationship plus 3 years.
- Incident reports and investigation records: 7 years from date of resolution.
- Support and compliance communications: 3 years from date of resolution.

After these periods, data is securely deleted or anonymised so it can no longer be linked to you.

9. How We Protect Your Data

We implement technical and organisational security measures including encryption of data in transit and at rest, strict access controls so only authorised personnel can access sensitive personal data, regular security reviews and audits, and documented incident response procedures.

Background check data, identity documents, and financial data are subject to additional access restrictions. If you discover a security vulnerability affecting Driver Partner data, please report it to info@lalais.app.

10. International Data Transfers

Because Lalais operates across entities in Timor-Leste and Singapore, your data may be transferred between those countries in the ordinary course of providing our service. This includes platform operational data processed by Laiharee Group Pte Ltd's systems in Singapore.

Earnings disbursement data may be processed through banking systems in multiple countries depending on your nominated account. International card payment data flows through Airwallex, which may process data in Australia and Singapore. Local mobile payment data (TPAY, Mosan) is processed within Timor-Leste.

All transfers are made only where necessary and with appropriate safeguards in place. By accepting the Driver Partner Agreement, you consent to these transfers.

11. Your Rights

Subject to applicable Timorese law, you have the following rights over your personal data:

- Access: you can request a copy of the personal data we hold about you, including your trip history, earnings records, and performance data.
- Correction: you can ask us to correct inaccurate or incomplete data, including errors in your profile or document records.
- Deletion: you can ask us to delete your data where it is no longer needed, subject to our legal retention obligations (for example, we are required to keep financial records for 7 years regardless).
- Portability: you can ask us to provide your earnings and trip data in a structured, machine-readable format.
- Objection: you can object to us using your data for non-operational purposes such as platform improvement analytics.
- Background check information: you have the right to be informed of any background check outcome that affects your account status, and to provide a response before any adverse decision is finalised.

To exercise any of these rights, contact info@lalais.app. We will respond within 30 days. Note that some rights may be limited where we have legal or contractual obligations to retain your data.

12. Automated Decision-Making

Some decisions affecting your account are made or assisted by automated systems, including:

- Trip matching: the platform automatically dispatches trip requests to you based on your location, availability, and acceptance rate.

- Performance monitoring: automated systems calculate and flag when your rating, acceptance rate, or cancellation rate falls below thresholds, triggering warnings or reviews.
- Cash commission balance tracking: the system automatically calculates your running cash commission balance and triggers payment demand notifications when the \$15 threshold is reached.

Where an automated process triggers a significant outcome for your account — such as a warning, suspension, or deactivation — you have the right to request human review of that decision. Contact driver info@lalais.app within 14 days of receiving the notification.

13. Cookies and Device Tracking

The Lalais Driver Partner App uses device identifiers and session tracking to maintain your login session, monitor app performance, and deliver trip requests to the correct device. This is necessary for the app to function and cannot be disabled while you are using the platform.

14. Changes to This Policy

We may update this Driver Partner Privacy Policy from time to time. If we make material changes, we will notify you via in-app notification or email at least 14 days before the changes take effect. Your continued use of the Driver Partner App after the effective date means you accept the updated policy. If you do not accept the changes, you may terminate your Driver Partner Agreement in accordance with the termination provisions of that agreement.

CONTACT US

Privacy questions: info@lalais.app