

Uber for Business

Privacy Impact Assessment (PIA)

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Document purpose

This document contains guidance for vendors that maintain and operate nonfederal systems. To provide the requested service, the vendor collects, maintains and/or disseminates personally identifiable information (PII) about the people who use such products and services. PII is any information that can be used to distinguish or trace an individual's identity like a name, address, or place and date of birth.

Vendors should use this PIA guidance to explain how and why they collect, maintain, disseminate, use, secure, and destroy information in ways that protect privacy. This PIA comprises sections that reflect GSA's [privacy policy](#) and [program goals](#).

A. System, Application, or Project Name: Uber for Business (U4B) - Uber for Business Dashboard

B. System, application, or project includes information about: Individuals who request or receive transportation through their enterprise profile on the Uber App; agency employees.

C. System, application or project includes these data elements:

For rides billed directly to an agency's account, the information below is viewable by agency administrators on the U4B Dashboard. Note: Agency admins cannot view details about trips taken on an agency employee's personal profile.

- Contact information: Full name, agency email
- Agency information: agency name, agency ID
- Payment method: Example, Mastercard, Visa
- Trip Information: Selected vehicle option, transaction, fare, taxes, currency, fees, pick-up and drop-off address, city, distance, duration
- Other: Date/time stamps of report, employee ID, expense code and memo (optional)

Overview

Uber for Business is a technology solution for businesses that leverages the ride hailing services of the Uber platform. The two main components are:

- For individuals who request or receive transportation through the Uber App (Riders)¹: agency employees can create an “Enterprise Profile” billing option within their Uber Rider Account that allows access to bill trips to the agency’s corporate billing arrangement.
- For agencies: agency administrators have access to a browser-based online dashboard that allows the agency to access agency employee trip information (if the agency employee consents to share trip information with the agency) for deep-dive reporting, expensing, and control features. This is not a hosted SAAS service. This is a data access service that is accessed through the U4B Dashboard.

An agency provides Uber the agency employee’s first name, last name, and email address (“Linking Data”). These data elements are necessary for authentication and verification purposes to enable an agency employee to securely establish an enterprise profile within the Uber app and and consents to sharing trip information with the agency by linking his or her personal Uber account. The agency employees can request rides on their enterprise account and bill the ride directly to the agency. Agency administrators can view trips on the U4B dashboard and have visibility into trip information in one place, streamlining receipt and approval tracking.

Since an agency employee name and work email is provided by the agency, the agency ensures that the agency employee’s information provided to Uber is accurate and complete. If an agency employee email is entered incorrectly by the U4B administrator, the agency employee will not receive an invite and the invite would appear as pending on the U4B Dashboard. Pending invite statuses would also occur if the agency employee receives the invite but declines to participate. The agency may, at any time, delete pending invites or unlink an agency employee from the enterprise account.

An agency employee’s enterprise profile may be unlinked from his or her Uber account at any time by deleting the enterprise profile option from his or her Uber Rider account. In addition, an agency may, at any time, unlink any agency employee’s Uber account from the enterprise account through the U4B Dashboard.

¹ Uber for Business is a platform for managing global rides. Drivers may choose to install and use video cameras, dash cams, or other recording devices to record rides or otherwise for the purpose of fulfilling transportation services. Local law or regulations may require individuals using recording equipment in vehicles to fully disclose to Riders that they are being recorded in or around a vehicle and obtain consent. See Uber’s Community Guidelines for more information.

<https://www.uber.com/legal/en/document/?name=general-community-guidelines&country=united-states&lang=en>

Section 1.0 PURPOSE OF COLLECTION

- 1.1 What legal authority and/or contractual agreements allow GSA to offer the vendors' services?**
Pursuant to Federal Acquisition Regulation FAR 13.303 GSA is authorized to award Blanket Purchase Agreements to Uber Technologies, Inc., abiding by the terms and conditions of the multiple awards BPA.
- 1.2 Explain how long and for what reason the information is retained. [Answered by GSA]**
The Government will maintain records in accordance with the National Archives and Records Administration policy. The Rideshare/Ride-hail BPA Holder(s) must maintain records in accordance with FAR Subpart 4.7 Contractor Records Retention and make available for examination pursuant to FAR 52.212-5(d).

Section 2.0 OPENNESS AND TRANSPARENCY

- 2.1 Will individuals be given notice before the collection, maintenance, use or dissemination of personal information about themselves? If not, please explain.**

Yes. When an agency administrator adds an agency employee to the agency's account, the agency employee will receive an email in his or her work inbox to join the agency's account. The agency employee will be notified of Uber's Terms and Privacy Notice <https://privacy.uber.com/policy/>.

An agency provides Uber the agency employee's first name, last name, and email address. These data elements are necessary for authentication and verification purposes to enable an agency employee to securely establish an enterprise profile within the Uber app and and consents to sharing trip information with the agency by linking his or her personal Uber account. The agency employees can request rides on their enterprise account and bill the ride directly to the agency. Agency administrators can view trips on the U4B dashboard and have visibility into trip information in one place, streamlining receipt and approval tracking.

Section 3.0 DATA MINIMIZATION

- 3.1 Why is the collection and use of the PII necessary to the system, application, or project?**

The Uber for Business Dashboard does not collect PII directly from individuals, rather, Riders consent to share trip data with the agency through the U4B Dashboard. The U4B Dashboard allows provisioned administrators to manage travel programs for internal business travel and also coordinate transportation for others. The administrator can configure a solution from the U4B Dashboard that meets the agency's needs by adding authorized employees, manage permissions, set payment options, spending limits and subsidize Uber rides taken on the Uber Rider app.

To enable an agency employee to link an enterprise profile from their personal Uber app to an agency U4B Dashboard, agency admins utilize the U4B Dashboard to maintain the list of authorized users that will include the agency employee's full name and agency-issued email address. The agency employee's full name and work email address is necessary for authentication and verification purposes to link the agency employee's Rider account with his or her enterprise account so that the agency employee can bill rides directly to the agency. During the linking process, employees consent to sharing trip-level data from their enterprise profile with the agency through the U4B Dashboard.

3.2 Will the system monitor the public, GSA employees, or contractors?

An agency provides Uber the agency employee's first name, last name, and email address. These data elements are necessary for authentication and verification purposes to enable an agency employee to securely establish an enterprise profile within the Uber app and and consents to sharing trip information with the agency by linking his or her personal Uber account. The agency employees can request rides on their enterprise account and bill the ride directly to the agency. Agency administrators can view trips on the U4B dashboard and have visibility into trip information in one place, streamlining receipt and approval tracking.

Agency admins have the ability to set policies for usage on a managed agency business profile based on spending allowance, trip allowance, time of day/week, and vehicle type. Agency admins may also set geofence restrictions to help ensure that subsidies are supporting the agency's trips for which they are intended. Once parameters are set, the trip cannot occur outside the parameters.

Agency employees can toggle using their enterprise account and personal account any time. Note: agency admins cannot view details about trips taken on an agency employee's personal profile.

3.3 What kinds of report(s) can be produced on individuals?

Agency administrators with appropriate permissions can access the U4B Dashboard and generate reports that help provide visibility into GSA-sponsored trips.

For rides billed directly to an agency's account, the information below is viewable by agency administrators on the U4B Dashboard. Note: Agency admins cannot view details about trips taken on an agency employee's personal profile.

- Contact information: Full name, agency email
- Agency information: Agency name, agency ID
- Payment method: Example, Mastercard, Visa
- Trip Information: Selected vehicle option, transaction, fare, taxes, currency, fees, pick-up and drop-off address, city, distance, duration

- Other: Date/time stamps of report, employee ID, expense code and memo (optional)

3.4 Will the data included in any report(s) be de-identified? If so, what process(es) will be used to aggregate or de-identify the data?

On a monthly basis agency administrators will receive a trip report that include; Trip ID, Transaction Timestamp, Request Date, Request Time, Request Date (Local), Request Time (Local), Drop-off Date, Drop-off Time, Drop-off Date (Local), Drop-off Time (Local), First Name, Last Name, Email, Employee ID (if given by agency), Service City, Distance (mi), Duration (min), Pickup Address, Drop-off Address, Expense Code (if given by agency), Expense Memo (if given by agency), Invoices, Program Group (if given set agency), Payment Method, Transaction Type, Fare in Local Currency (excl. Taxes), Taxes in Local Currency, Tip in Local Currency, Transaction Amount in Local Currency (incl. Taxes), Local Currency Code Fare in USD (excl. Taxes), Taxes in USD Tip in USD, Transaction Amount in USD (incl. Taxes), Estimated Service and Technology Fee (incl. Taxes, if any) in USD. This data will not be de-identified.

Section 4.0 LIMITS ON USING AND SHARING INFORMATION

4.1. Is the information in the system, application, or project limited to only the information that is needed to carry out the purpose of the collection?

Uber processes an agency's employee's name and work email to send a linking email, link the data to existing accounts, and enable account creation. Uber contractually agrees that it may not sell or otherwise publicly disclose Linking Data or use Linking data for any purpose that is detrimental or harmful to the agency.

4.2. Will the vendor share any of the information with other individuals, federal and/or state agencies, or private-sector organizations? If so, how will the vendor share the information?

An agency provides Uber the agency employee's first name, last name, and email address, which Uber does not share with other individuals, agencies, or private-sector organizations. These data elements are necessary for authentication and verification purposes to enable an agency employee to securely establish an enterprise profile within the Uber app and and consents to sharing trip information with the agency by linking his or her personal Uber account. The agency employees can request rides on their enterprise account and bill the ride directly to the agency. Agency administrators can view trips on the U4B dashboard and have visibility into trip information in one place, streamlining receipt and approval tracking. For more information, see Uber's Privacy Notice: <https://privacy.uber.com/policy/>.

4.3. Is the information collected directly from the individual or is it taken from another source? If so, what is the other source(s)?

The Uber for Business Dashboard does not collect PII directly from individuals, rather, Riders consent to share trip data with the agency through the U4B Dashboard. The U4B Dashboard allows provisioned administrators to manage ground transportation programs for internal business travel and also coordinate transportation for others. The administrator can configure a solution from the U4B Dashboard that meets the agency’s needs by adding authorized employees, manage permissions, set payment options, spending limits and subsidize Uber rides taken on the Uber Rider app. This is not a hosted SAAS service. This is a data access service that is accessed through the U4B Dashboard.

To enable an agency employee to establish an enterprise profile, agency admins utilizes the U4B Dashboard to maintain the list of authorized users that will include the agency employee’s full name and agency-issued email address. The agency employee’s full name and work email address is necessary for authentication and verification purposes to and link the agency employee’s Rider account with his or her enterprise account so that the agency employee can bill rides directly to the agency.

Agency admin view:

The screenshot displays the 'Activity' section of the Uber for Business Dashboard. On the left, there is a navigation menu with sections for 'ACCOUNT' (Activity, People, Billing, Settings) and 'PERMISSIONS' (Uber Travel, Uber Central). The main content area shows a table of activity with the following data:

Date	Time	Employee	Location	Service	Amount
01/26/17	07:53am	Sylvia Carr	San Jose	Travel	\$40.64
01/25/17	01:46pm	Beatrice Morales	Sao Paulo	Travel	\$R31.49

The detailed view for the first trip includes a map of the San Jose area, a fare of \$40.64, a trip ID of A4B0FA9F, a trip time of 00:22:36, and 7.90 miles. It also lists an expense code 'GENTRAVEL' and an expense memo 'Dropping off Sam at the BART station'. A note indicates that the trip is flagged.

Section 5.0 DATA QUALITY AND INTEGRITY

5.1 How will the information collected, maintained, used, or disseminated be verified for accuracy and completeness?

Since an agency employee name and work email is provided by the agency, the agency ensures that the agency employee's information provided to Uber is accurate and complete. Agency employees can contact their agency regarding trips billed to the agency's enterprise profile. Agency employees can manage their personal account within the Uber App and may submit a privacy inquiry directly to Uber that will allow individual users to access their information. Uber maintains designated external feedback channels, for example, Help pages and call support, for individuals to voice privacy concerns. Uber's Privacy Team monitors these channels and has established processes to address and escalate this feedback, as appropriate.

Section 6.0 SECURITY

Customer agencies that would like to review security documents can request access from the Program Management Office through the rideshare.ridehail@gsa.gov email box. Dedicated reading room sessions can be provided to interested customer agencies in order to view current security documents.

Section 7.0 INDIVIDUAL PARTICIPATION

7.1 What opportunities do individuals have to consent or decline to provide information? Can they opt-in or opt-out? If there are no opportunities to consent, decline, opt in, or opt out, please explain.

An agency invites users to join the agency's enterprise account by providing Uber the agency employee's first name, last name, and email address. These data elements are necessary for authentication and verification purposes to enable an agency employee to securely establish an enterprise profile within the Uber app.

An agency employee will receive an email notification to join the agency's enterprise account that includes Uber's Terms and Privacy Notice <https://privacy.uber.com/policy/>. By accepting the invite, the agency employee consents to sharing trip information with the agency by linking his or her personal Uber account. Agency employees may unlink their enterprise profile from their personal Uber accounts at any time by deleting the enterprise profile option from his or her Uber Rider account.

Since an agency employee name and work email is provided by the agency, the agency ensures that the agency employee's information provided to Uber is accurate and complete. If an agency employee email is entered incorrectly by the U4B administrator, the agency employee will not receive an invite and the

invite would appear as pending on the U4B Dashboard. Pending invite statuses would also occur if the agency employee receives the invite but declines to participate. The agency may, at any time, delete pending invites or unlink an agency employee from the agency enterprise account.

7.2 What procedures allow individuals to access their information?

Agency employees can contact their agency U4B administrators regarding trips billed to the agency's enterprise profile. Agency employees can manage their personal account within the Uber App and may submit a privacy inquiry directly to Uber that will allow individual users to access their information.

Uber maintains designated external feedback channels, for example, Help pages and call support, for individuals to voice privacy concerns. Uber's Privacy Team monitors these channels and has established processes to address and escalate this feedback, as appropriate.

7.3 Can individuals amend information about themselves? If so, how?

Agency employees can contact their agency U4B administrators regarding trips billed to the agency's enterprise profile. Agency employees can edit the information associated with their personal account through the Settings menu in their Uber app. Users may also ask that Uber change or update their data, including if they believe such data is inaccurate or incomplete by contacting Uber or submitting a privacy inquiry directly to Uber.

Uber facilitates transparency and choice by providing consumers with privacy settings and the right to access and correct personal information associated with their accounts. For example, Uber's data download service allows users to download mobile event data related to their Uber Rider trips. In addition, Uber has built several data minimization and management technical solutions, including a platform to manage account deletion requests, capabilities to support data deletion in big data systems, and other technical controls.

Section 8.0 AWARENESS AND TRAINING

8.1 Describe what privacy training is provided to users, either generally or specifically relevant to the system, application, or project.

Uber provides mandatory privacy and security foundational training to employees upon hire and annually thereafter. This training covers privacy and security practices and policies relating to physical and cyber security, data access, privacy by design, data minimization, retention and disposal, notice and transparency, consent, and data accuracy.

Section 9.0 ACCOUNTABILITY AND AUDITING

9.1 How does the system owner ensure that the information is used only according to the stated practices in this PIA?

Uber maintains a privacy program designed to meet requirements of the privacy and data protection laws in the jurisdictions in which Uber operates. The privacy program is overseen by Uber's Chief Privacy Officer. This privacy program includes efforts from Uber's privacy engineering and privacy legal teams, working to enforce privacy as a routine key consideration early in product and engineering life cycles and to advise other teams regarding privacy and data protection requirements.