

Exploratory study of consumer issues in online peer-to-peer platform markets

Task 4 - Case study: Nimber







EUROPEAN COMMISSION

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Exploratory study of consumer issues in online peer-to-peer platform markets

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1 Introduction

1.1 Platform overview

Nimber connects peer consumers wishing to ship a parcel to a destination with peer providers going in that direction.¹ Nimber is available on the web and via app (iOS and Android). Through the platform, peers can agree on the price and on when and where to exchange and deliver the parcel.

Nimber describes itself as a 'matching service' and a 'social delivery service', not as a parcel delivery company². The platform claims to target a sub-market not covered by the national postal services and courier companies. This includes big bulky items, as well as small items that need to be carried too far to be of interest to local delivery companies³.

Nimber operates in national languages in Norway and the United Kingdom, where the platform has sizeable communities. The platform is also accessible worldwide, where it currently only offers the matching service, without add-on services such as insurance and customer support⁴ and it has little to no transaction volume⁵. For this reason, this case study covers only Norway and the UK.

At the end of 2014, the platform had more than 30,000 registered users⁶. In 2015 the company registered 2,354,076 km travelled by peer providers, 36% more than the previous year. The platform also estimated that, by not having another car shipping the parcel, the platform saved 785 tonnes of CO2 and 3,345 barrels of oil. It also saved peer consumers 86,037 hours of driving⁷. By the end of 2016, Nimber aims to facilitate more than 3,218,688 km travelled by peer providers⁸.

1.2 User experience

To access the service, peers must register on the platform. The registration process is the same for peer providers and peer consumers. To start the registration process (Figure 1), both peers can use their Facebook account or their personal email. To complete the registration procedure, peers must provide additional information as described in more detail in section (2.5.2).

¹ Within the scope of this case study, desk research and the mystery shopping exercise were carried up until December 2016. Some minor clarifications regarding the core research results were sought until February 2017.

² Information available at: https://www.nimber.com/terms, accessed on 16/09/2016

³ Information available at: https://www.theguardian.com/business/2015/jul/12/nimber-delivering-sharing-economy-innovation-airbnb-uber, accessed on 16/09/2016

⁴Feedback received by Nimber on 15/08/2016

⁵ Ibid.

⁶ Information available at: https://www.nimber.com/press, accessed on 16/09/2016

⁷ Information available at: http://blog.nimber.com/, accessed on 16/09/2016

⁸ Information available at: http://blog.nimber.com/, accessed on 16/09/2016

Figure 1: Nimber registration



The platform is a for-profit company that allows peer consumers to publish requests, specifying the object that needs to be shipped, the route (start and end-point), by when the parcel should be delivered, and the maximum fee offered for the service.

Peer providers use filters to search for listings on the main page, and they can offer to take on the shipment, make a counteroffer and arrange the details.

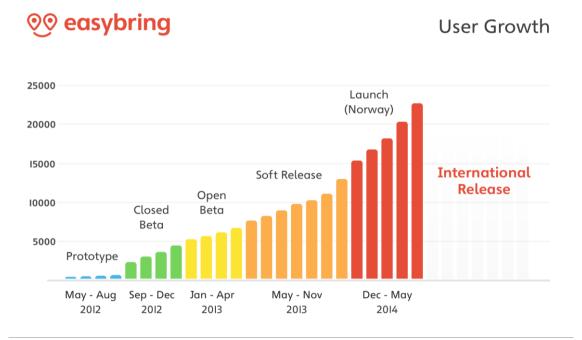
After finding a match and agreeing on the details, the peer provider collects the parcel and delivers it to the destination. After delivery, both peers must confirm the completed task before money are transferred.

2 Assessment of the platform

2.1 Evolution of the platform business model

In 2012 Nimber started operation in Norway under the name Easybring. The name changed in 2014, following disputes with Posten (Norway postal service) for use of the verb "bring", and the easyGroup for use of the word "easy"⁹.

Figure 2: User growth up to 2014



In January 2014 Nimber launched the final version of the platform in Norway. In early 2015 the company moved its headquarters to London.

In June 2014 Nimber released an English version of the platform, making the service potentially available worldwide. While consolidating its position in Norway, the platform is now focusing on expanding its network in the UK¹⁰. Between 2013 and 2014 the company registered a global 425% increase in delivery requests¹¹. No major business model changes have been implemented since the open beta release in 2013.

As of August 2016, Nimber does not offer any add-on services. However, the introduction of a premium service (faster delivery service for a higher fee) is currently being considered¹².

2.2 Current business model

2.2.1 Business model and pricing

Currently, the platform does not differentiate between private and commercial peer providers. In Norway, 40% of peer providers are individuals who may be travelling from one side of the city or country to another and can take a package. The rest (60% of the deliveries) are managed by either commercial operators such as delivery companies or

⁹ Information available at: https://www.nimber.com/press, accessed on 16/09/2016

Information available at: http://realbusiness.co.uk/article/30948-social-delivery-service-nimber-wraps-up-investment-and-enlists-debbie-wosskow, accessed on 16/09/2016

¹¹ Information available at: https://www.nimber.com/press, accessed on 16/09/2016

¹² Information available at: http://www.theguardian.com/business/2015/jul/12/nimber-delivering-sharing-economy-innovation-airbnb-uber, accessed on 16/09/2016

by peers who travel for work, such as sales representatives or people who work with a van¹³.

Nimber claims to be the leading global matching platform for deliveries. According to the platform they are the largest non-incumbent player in Norway today, in the category of large/bulky items sent over long distances¹⁴. There are no data to assess the revenue of the platform (e.g. revenue, number of employees, balance sheet total) or its market penetration¹⁵. Table 1 represents the business model canvas of Nimber.

Table 1: Business model canvas for Nimber

Key Partners	Key activities	Value proposition	Customer relationship	Customer segments
 Community Investors Payment provider (Stripe) 	 Product development/ management Network building Payment management (externalized) Customer service Key resources Community Technology 	 Improved efficiency in asset use Possibility to ship uncommon shapes Possibility to ship uncommon routes 	•Communities •Co-creation (reviews and rating) Channels •Direct online: web & app	• Mass market
	recimology		(IOS, Android)	
Cost structure		Reve	nue streams	
Platform deve updates)Operating costsOverheadsMarketing costs	(cost + ∙Tra	nsaction fees	

Like many online collaborative economy platforms, Nimber's activities mainly consist of the development and maintenance of a platform and a network of participating peers. The cost structure is characterized by high initial fixed costs and very low marginal costs.

The platform's revenue generating model is based on transaction fees. For each transaction, Nimber charges a variable fee that starts at EUR 2.40(£2) and can go up to a maximum of 20% of the overall cost. The transaction fee is inclusive of VAT and insurance.

The platform uses a dynamic pricing mechanism¹⁶ to calculate the suggested price for the service. According to the platform the proposed price is calculated by an algorithm based on several variables, including distance and time needed to reach the destination, size of the parcel and the urgency of the delivery.¹⁷ According to the platform the suggested price does not take into consideration the prices offered by other delivery services^{18,19}.

The suggested price is clearly communicated to peers as shown in Figure 3. Suggested prices are not mandatory, and peer consumers can freely set the price that they are willing to pay for shipping the parcel. The platform will automatically show the

¹⁵ Due to sensitivity of these data, the platform did not share this information with the study team.

¹³ Interview with Ari Kestin (CEO) 21/05/2016

¹⁴ Feedback received by Nimber on 15/08/2016

¹⁶ Dynamic pricing allows online companies to adjust the prices of identical goods to correspond to a customer's willingness to pay.

Feedback received by Nimber on15/08/2016

¹⁸ Feedback received by Nimber on15/08/2016

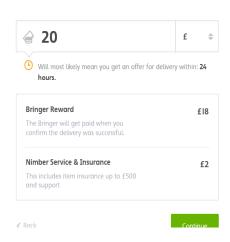
¹⁹ For comparison, a parcel of 35 kg shipped from Oslo to Bergen costs NOK 38019 (€40.91), while Nimber for the same route and a medium size parcel suggests a total price of NOK 450 (€48.45).

breakdown of how much will be offered to peer providers and the platform's fee, inclusive of VAT and insurance.

Peer consumers cannot cancel the request if they have already accepted an offer from a peer provider.

Figure 3: Price proposed to ship a parcel

Similar tasks cost between: £10 and £40



Nimber business model has common characteristics with the **second type of business models identified in the Final Report (active management).** The platform actively facilitates transactions thanks to:

- Active matching of demand and supply through search functions/filters and instant messaging system
- User information checks (through email or social media or phone)
- Non-binding pricing guidance
- Guidance for P2P interactions
- Management of peer review and reputation system (ratings)

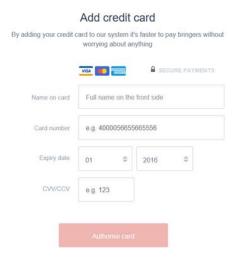
In addition, some platform features also clearly belong to the **third type of business models (platform governed transactions)**, such as:

- Management of payments and monitoring success of transaction before releasing payment to peer provider
- Management of complaints and refunds of P2P transactions
- Provisions of insurance as part of the transaction fee

2.2.2 Payment

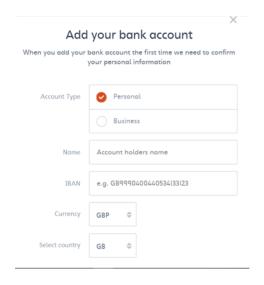
All payments are made via the platform by credit or debit card. To accept an offer from a peer provider, the peer consumers must enter their card details as shown in Figure 4.

Figure 4: Payment information



After delivering the parcel, the peer provider should mark the task as completed on the account profile. Delivery confirmation is also required from the peer consumer (within 24 hours from the delivery of the parcel). After the double confirmation, the platform's payment system charges the peer consumer for the service. The peer provider's share of the payment is sent to the bank account specified in the "your wallet" section in the Nimber account as shown in Figure 5. The platform does not specify how long it takes for peer providers to receive the payment.

Figure 5: Bank details



As of August 2016, all payment services on Nimber are provided by third parties, (Braintree and Stripe)²⁰. The platform controls and manages the money transfer and it monitors the success of the transaction before releasing the funds.

2.3 Consumer experience

2.3.1 Satisfaction with overall experience and likelihood to use the platform again

According to the online survey included in Task 2 of this study, user satisfaction with Nimber is low (see Figure 6), both among Sharing/Hiring ride platforms and across all P2P platforms covered in the survey.

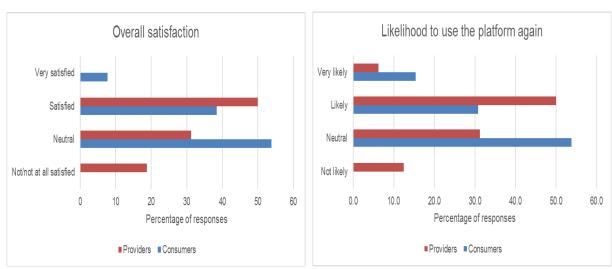
²⁰ Information available at: https://www.nimber.com/terms, accessed on 16/09/2016

- 46.2% of peer consumers and half of peer providers are satisfied or very satisfied with their overall experience.
- These figures compare with 83.4% and 77.2% for all P2P platforms and 63.9% and 74.2% for all Odd jobs platforms.

Similarly, 46.2% of peer consumers and 56.7% of peer providers are likely or very likely to use the platform again in the future. This compares negatively with 86.6% and 82.4% for all platforms, and 72.4% and 66.1% for all Odd jobs platforms.

While these survey results should be considered with caution as they are based on only 29 respondents, satisfaction levels and likelihood to use Nimber again in the future are lower than average.

Figure 6: Satisfaction with overall experience on Nimber and likelihood to use the platform again in the future



Source: GfK survey, Task 2 (sample of 29 respondents, of which 16 peer providers and 13 peer consumers)

Due to the very small number of peer consumer respondents (i.e. 13), the frequency of problems encountered is not analysed in this case study.

2.3.2 Knowledge of rights and obligations

Peers on Nimber are not sufficiently aware of their rights and obligations, or the platform's responsibilities in case something goes wrong, and the platform performs below the average of all P2P platforms in this area.

- 53.8% of peer consumers do not know or are not sure about their rights when something goes wrong, the platform's responsibility in case of a problem with a peer provider, and compensation/reimbursement rights. This compares favourably to an average of 59% for all P2P platforms.
- This rises to more than 68.8% for peer providers as regards the platform's responsibility for problems with peers, and rights when something goes wrong (compared with an average of 59% for all P2P platforms). 56.3% of peer providers did not know or were not sure about their compensation/reimbursement rights.

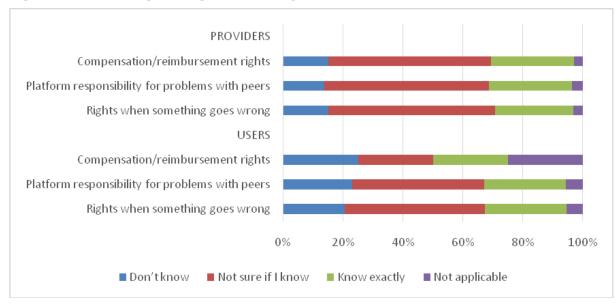


Figure 7: Knowledge of rights and responsibilities on Nimber

Source: GfK survey, Task 2 (sample of 29 respondents, of which 16 peer providers and 13 peer consumers)

2.4 Transparency aspects

2.4.1 Information to platform users (clarity, easy accessibility)

Contact details for the company are provided in the 'About Nimber' section of the website including physical addresses of the headquarter in the UK and the representative office in the US (Silicon Valley), an email address for Marius Røstad, the Head of Products and Ching-Yun Huang, the Head of Marketing as well as the support department.

Ari Kestin is the CEO of Nimber. Nimber is a limited for-profit company registered in the UK (Company number 09359744) incorporated on 18 December 2014 21 with a capital of £538,817 in 2015 22 . To date, Nimber has been financed through venture capital and business angels 23 . The list of the 18 shareholders is available online 24 .

Further information about the platform can be either found in the FAQ section, the guidelines section or in the platform's Terms and Conditions. Unlike other platforms, the T&C are not directly reachable from the home page but users need to click on a link at the bottom of the guidelines section.

The T&C specify that peers are responsible for providing accurate, true and non-misleading information on the platform. At the same time, the platform explicitly declines any liability for the P2P transaction or for the accuracy of information, user IDs or information verification²⁵.

Information about tax rules is generic and not country specific. The website's FAQ section states that most countries allow peers to carry items to help cover the cost of travel without any tax implications²⁶. The Nimber website also states that most countries' tax

 $^{^{21}}$ Information available at: https://beta.companieshouse.gov.uk/company/09359744, accessed on 16/09/2016 22 Ibid.

²³ Feedback received by Nimber on15/08/2016

²⁴ Information available at: https://beta.companieshouse.gov.uk/company/09359744

²⁵ Information available at: https://www.nimber.com/terms, accessed on 16/09/2016

²⁶ Information available at: https://www.nimber.com/faq, accessed on 16/09/2016

regulations allow peers to earn up to a certain amount of money from unique commissioners (sender) tax free²⁷.

The platform does not provide clear information on the profit nature of the activity. It informs professional providers that they are required to pay income taxes on their earnings, and strongly advises to consult a local tax professional for proper guidance. According to the platform, so far there have been no court cases regarding income generated through use of the platform²⁸.

The split between transaction fees for the platform and peer provider remuneration for the delivery service is clearly indicated. However, no break-down of the transaction fee is provided even though this should include both the service fee and the insurance offered through the platform. Information about the insurance coverage included in the transaction fee is vague (see section 2.6.3).

The platform does not provide a section on safety nor any information on what to do in case something goes wrong with the transaction or in case of problems with peers.

Provisions on Nimber are ambiguous, as the platform does not prevent commercial activity, but does not allow commercial providers to use their business name.

2.4.2 Terms and conditions

To register and use the service each peer must accept the platform's T&C. The terms and conditions only regulate the relationship between each peer and the platform. Subscribing to the T&C is mandatory to create an account as stated on the platform:

"You agree that by registering a user profile on Nimber, you are entering into a legally binding agreement with Nimber. Furthermore, you agree that by using the Service, you agree to those provisions of this document which concern the content on the Service and your conduct thereon. If you do not want to use the Service and be bound by the provisions of this Agreement, do not register as a User".

Since each peer can be both a provider and a consumer, no distinction is made in the T&C. The T&C indirectly regulate also the relation between consumer and providers, for example by creating a list of products that cannot be delivered using the service, including: firearms or components of firearms, weapons, corrosive or hazardous substances, drugs and tools capable of being used as weapons and explosives²⁹.

Nimber explicitly states that it is not liable for claims, charges, and investigations, caused by failure to comply with the terms and conditions.

Furthermore, the terms and conditions state that Nimber discloses contact information and other personal data about the peers to the extent necessary to facilitate the contact between peers and enable transactions to take place. Specifically, the T&Cs state that "when registering with Nimber you the User agree that Nimber may use and store the information provided by you for Nimber to manage and maintain the relationship with the User."

Finally, section 8 of the T&C contains general information on Cookies. The section states that: "for detailed information on the cookies we use and the purposes for which we use them, please see our Cookie policy."³⁰ However, as of August 2016, no cookie policy was available online, neither on the website nor in the profile pages.

30 Ibid.

Information available at: http://feedback.nimber.com/knowledgebase/articles/91886-faq-for-easybringers, accessed on 16/09/2016

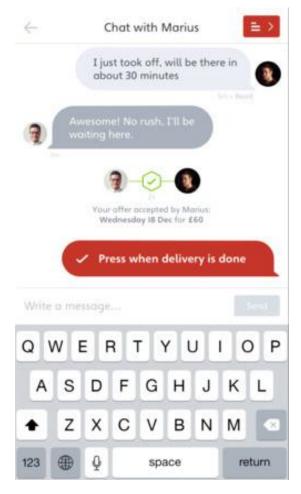
²⁸ Feedback received by Nimber on15/08/2016

²⁹ Information available at: https://www.nimber.com/terms, accessed on 16/09/2016

2.4.3 Data protection

No personal data provided to the platform is shared with other peers until a peer provider and a peer consumer have decided to engage in a transaction. At that point both peers get access to one another's telephone contact number and a chat function is made available on the platform (Figure 8). The platform suggests using the chat option so that Nimber can keep copies of communication in case any issue arise.

Figure 8: Chat and delivery completed button



The platform guarantees that all personal data will be processed in a fair and lawful way in accordance with the Data Protection Act 1998³¹. As mentioned above, as of August 2016, no cookie policy was available online and therefore no information about data use or reuse, or sharing or selling data with third parties is provided. However, it is stated that Nimber may disclose the information gathered to a competent authority if required by law³².

A Nimber spokesperson stated that the company has implemented technical and organizational measures to reasonably protect personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access. Nimber stores most of its data using cloud technologies provided by Amazon Web Services.³³

³¹ Information available at: https://www.nimber.com/terms, accessed on 16/09/2016

³² Information available at: https://www.nimber.com/terms, accessed on 16/09/2016

³³ Interview with Ari Kestin (CEO) 21/05/2016

To conclude, publicly available information about data protection overall is poor. Users outside the UK may not know about the UK Data Protection Act 1998 and no cookie policy or information about reuse of data by third parties is provided.

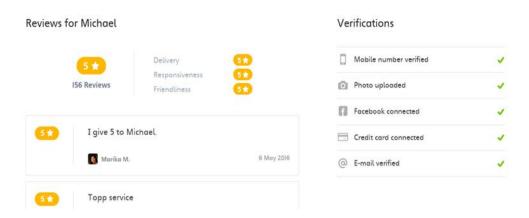
2.5 Trust building and verification of information

2.5.1 Peer reviews and ratings

After a transaction is completed, peer consumers can leave ratings and reviews to one another. The rating consists of one to five stars in two/three categories: Readiness, Friendliness (and Delivery for the peer providers).

Ratings and reviews are not compulsory. In the mystery shopping experience conducted for this study, it was found that the average peer provider has a higher number of ratings and reviews compared with the average peer consumer. This difference might reflect the fact that users willing to transport a parcel are on average more regular platform members compared with users trying to ship a parcel. The platform did not share information on the number of reviews per user for this case study. Figure 9 shows an example of a highly-ranked peer.

Figure 9: Profiles' reviews



Nimber does not specify if it proactively monitors its peer review and reputation system.

2.5.2 Verification of peer information by platform

No official identity documents or driving licence are required to register on Nimber and the platform does not run any criminal record check. According to the guidelines section, when registering, all peers are required to send their own first and last name, mail address and mobile number. Failure to provide truthful information might result in either suspension or deletion of the account³⁴. The Table 2 summarises the information requested by the platform to facilitate transactions.

Table 2: Information collected by the platform to facilitate P2P transactions

Name
Address
Email address
Mobile phone
Credit card information
Banking information
Picture
Facebook/Google profile information (if provided)

³⁴ Information available at: https://www.nimber.com/guidelines, accessed on 16/09/2016

To confirm their email address peers must reply to the welcome email (Figure 10). To confirm the phone number, a PIN is sent to the user's phone by the platform which has to be entered on the account information page (Figure 11).

Figure 10: Welcome email

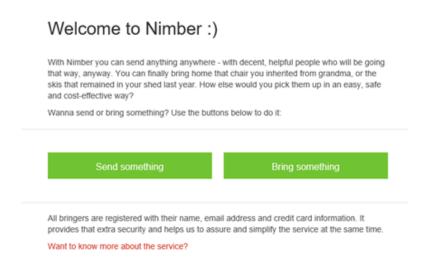
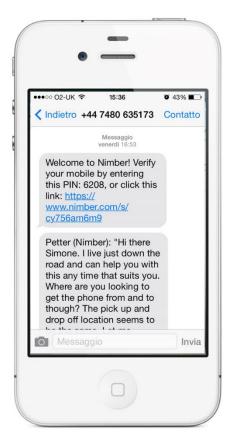


Figure 11: PIN to confirm the mobile number



As of August 2016, in the T&C Nimber claims to "use techniques that aim to verify the accuracy and truth of the information provided by our users", but it does not specify which kind of verification tool it uses and this information was not shared with the research team. In addition, the T&C states: "Nimber cannot and does not confirm, and is not responsible for ensuring, the accuracy or truthfulness of Users' purported identities or the validity of the information which they post on our site."

Personal data is collected directly from the User or from Facebook. Through cookies the platform also collects information about the activity on the platform. Disabling cookies prevents users from using certain features of the service.

The use of a profile photo is highly encouraged and specific reminder emails are sent to the account email address to highlight the importance of photos for improving community trust and fostering successful transactions for both peer consumes and peer providers.

Companies can use Nimber to utilize their spare capacity, but there is no specific company profile; instead company drivers are required to use their personal names and they cannot advertise the services of their company on the platform. Nimber also does not allow peer providers to use company names as accounts. Failure to follow this might result in either suspension or deletion of the account³⁵.

To sum up, Nimber does not run any criminal record check or verify identity documents. The platform also says that it is not responsible for inaccurate or incorrect information or for verification of peer information and identity. The only information that is actively checked by the platform is the existence of the email address and mobile numbers provided.

2.6 Complaints, redress and insurance

2.6.1 Complaints handling mechanisms

Nimber complaints handling system is overall very limited. To communicate with the platform two emails are available: support@nimber.com and contact@nimber.com. The website also offers the possibility to send questions by email directly from the account. The platform uses a system of internal tickets to manage customer feedback and complaints. No information regarding the number of complaints was provided by the platform.

2.6.2 Access to redress

Peers are encouraged to contact the platform via email for any dispute. According to section 15 of the T&C, Nimber's policy is to resolve every dispute through alternative dispute resolution procedures, such as mediation or arbitration, as alternatives to litigation.

Refunds are issued at the discretion of Nimber within a 30-day period after the date of the order. No further information on the refund policy, the number of complaints or user feedback is publicly available or was provided by the platform.

According to the T&C "non-exclusive jurisdiction of the English Courts" applies, therefore, by agreeing to T&Cs, peers agree for English law to apply in any possible court case. Every dispute arising between a peer and Nimber (a UK based company) will be governed by and construed in accordance with the laws of England & Wales no matter where the dispute took place.

To sum up, Nimber's redress policy is unclear, as there is no information on the refund policy, the only form of contact with the platform is via e-mail and there is no structured redress system in place. In the absence of a specific, clear policy, reimbursement ultimately remains at the discretion of Nimber.

2.6.3 Access to Insurance

According to the platform, there is an insurance that **covers the value of the parcel** up to £500 in the United Kingdom, €1,000 in Europe and 10,000 NOK in Norway. Details

³⁵ Information available at: https://www.nimber.com/guidelines, accessed on 16/09/2016

about the insurance service are not available online and some peers have complained about the lack of information³⁶. There is no information about who manages the insurance, and which kind of insurance it is. The platform claims that it covers the parcel up to the maximum sum for "any damage". According to an interview with the platform, the insurance is managed directly by Nimber because this allows the company to handle any claims directly³⁷.

Figure 12: example of insurance statement (€1000) while creating a new delivery (peer consumer prospective)

Your item is insured for any damage up to 1000€		000€
Photo	Not set	Add photo
Title	Office chair	EDIT
Total Cost	£30	EDIT
From - To	N5 IRF London - Brighton	EDIT
Description	No description	ADD
Size	M - This fits in a normal car	EDIT
Delivered by	Friday 30 Sentember - II-59 PM	EDIT

Figure 13: example of insurance statement (£500) while viewing a delivery (peer provider prospective)

12	
	The item is insured for any damage up to £500
Size:	M - This fits in a normal car
Must be delivered by end of:	Friday, 30 September – 11:59 PM
Reward:	£30
	Nimber will transfer this amount to your bank account. after delivery is confirmed.
Picked up from:	Holloway Road, N5 1RF Londor
Can someone help carry:	_

For any insurance claim, an email should be sent to the platform. At the time of research, there was no clear procedure on how claims are managed and there are no data on the number and success rate of claims.

2.7 Cross-border dimension

The platform potentially does offer cross-border services. In the T&C the platform denies any responsibility for customs, legal and/or financial issues related to the transport of goods arising out of cross border transports³⁸. According to the company cross-border activity is still extremely rare³⁹. In the FAQ section, the platform suggests peer providers inform themselves regarding custom duty issues in cross border transactions. There are no data on the share of cross border activity.

³⁶Information available at: http://feedback.nimber.com/forums/167127-general/suggestions/10590240-improving-confidenceand-security-for-both-parties, accessed on 16/09/2016 ³⁷ Interview with Ari Kestin (CEO) 21/05/2016

³⁸ Information available at: https://www.nimber.com/terms, accessed on 16/09/2016

³⁹ Interview with Ari Kestin (CEO) 21/05/2016

3 Conclusions

3.1 Main findings

3.1.1 Contribution to the business model typology

In terms of business models, Nimber shares several characteristics with the second type of business model identified in the Final Report (**active management**) as it:

- Actively matches demand and supply through search functions/filters and instant messaging system;
- Provides user information checks (through email or social media or phone);
- Provides non-binding pricing guidance and guidance for P2P interactions; and
- Manages peer review and reputation system (ratings).

In addition, in line with the third business model (**platform governed peer transactions**), the platform also:

- Manages payments and monitors success of transaction before releasing payments to peer providers;
- Manages complaints and refunds of P2P transactions; and
- Provides insurance as part of the transaction fee.

3.1.2 Transparency of the platform, including information provided to peers

The platform provides information to peers in a FAQ section and in the guidelines and the T&C pages.

Nimber clearly shows the breakdown of the total price in terms of transaction fee and peer provider reward.

The platform explicitly declines any liability related to the P2P transaction and to peers who submit inaccurate or incorrect information.

The platform does not distinguish between professional and non-professional peer providers. People working for commercial providers can offer services on the platform, but not on behalf of the company. The contractual nature of transactions is not explained and therefore remains unclear for peer consumers. Information about taxes, refund and insurance policy are poor, and no information is provided on what to do in case of non-performance, or on the platforms privacy policy.

3.1.3 Trust building and verification of information

Nimber offers the possibility to rate and review other peers through a non-mandatory rating and review system. It does not guarantee the truthfulness of reviews. Statistics such as parcels delivered, parcels not delivered, parcels delivered on time, etc. that could further enhance trust within the community are not available.

Nimber does not request or verify official identity documents or driving licences of peers. In the T&C it denies liability for inaccurate or incorrect identity information or for ID or peer information verification. This denial of liability is only contained in the T&C and not in the guidelines or FAQ section.

3.1.4 Access to complaints, redress and insurance

The only channel for communication with the platform is email or the internal messaging system. No specific policy on how complaints are managed is provided. Refunds are issued at the discretion of Nimber.

3.1.5 Cross-border issues

The number of cross-border deliveries is limited⁴⁰. The platform declines any liability or responsibility relating to customs, legal and/or financial issues in cross-border transport. In the FAQ section, the platform suggests peer providers and consumers to independently research information regarding customs duties related to cross-border transactions.

3.2 Good practices

To match peers the platform uses most of the well-established practices in the peer-to-peer sharing sector, such as: geolocation, access from app, internal chat, use of ratings and reviews. The platform interface is overall intuitive and user-friendly and the breakdown of costs between platform fees and peer provider revenue is clearly shown to all users.

3.3 Elements of concern

The platform does not provide any information about the responsibility that peers have when engaging on the platform. No specific information is available on the complaint and refund process and on what to do in case something goes wrong.

The platform advertises an insurance but no specific information on this service is available. When interviewed, the platform claimed to be directly responsible for the management of the insurance without providing any further information regarding the terms of the service, the number of claims, pay-outs or the premium.

Official ID is not requested nor verified and the platform explicitly declines any liability related to peers who submit inaccurate or incorrect information or for ID or information verification. The lack of adequate ID verification may raise concerns considering that to use the service people need to meet face to face and geolocation data is exchanged between platform users.

3.4 Future developments

There are no relevant developments that are directly related to consumer protection. As of August 2016, the platform was planning to consolidate its position in the UK and Norway.

⁴⁰ Information available at: http://blog.nimber.com/, accessed on 16/09/2016