

Global Privacy Notice for Drivers (Dubai)

Bolt Operations OÜ (Company Registration Number 12417834) located at Vana-Lõuna tn 15, Tallinn 10134, Republic of Estonia, is the controller of personal data of drivers and has appointed a Data Protection Officer (privacy@bolt.eu). More information about Bolt, its group companies and Partners, such as the relevant Bolt group company or Partner operating your market, is set out [here](#).

This Privacy Notice ("Notice") describes how Bolt Operations OÜ and its group companies ("Bolt") and third-party partners ("Partner(s)") (collectively "We," "Us," or "Our") collect and use the personal data of persons providing transportation services via the Bolt platform, i.e., drivers. The Privacy Notice describes what data and why We process, how We keep personal data safe and what choices and controls are available to the data subjects (hereinafter also "you"). You can also find information about your privacy rights in the Privacy Notice.

If you are a driver on the Bolt platform, please read this Privacy Notice as it contains important information about the processing of your personal data as well as information about Our requirements when you process passengers' personal data.

Please note that Bolt's personal data processing activities may be subject to differing applicable laws and regulations in the places in which Bolt operates (whether through itself or its subsidiaries or Partner). This means that Bolt engages in the personal data processing activities described in this Notice in a particular country only if permitted under the laws of that country. For further information about the jurisdictional disclosures and differences that may apply to you, please refer to Section 8 'Jurisdictional Disclosures' below.

Please note that Our websites and apps may contain links to other third-party websites. If you follow a link to any of those third-party websites, know that they have their own privacy policies and that We do not accept any responsibility or liability for their policies or their processing of your personal data.

Please check these policies before you submit any personal data to such third-party websites.

1. Personal Data We Process

We may process different categories of driver's personal data. The data categories are as follows:

- **General data** such as name, e-mail, phone number, place of residence (data is provided to Us by the driver).
- **Geolocation data** such as geolocation of drivers and driving routes (data is gathered via Bolt system when driver uses Bolt app).
- **Information about vehicles** (including registration number and compliance status) (data is provided to Us by the driver).

- **Usage data** such as driver's engagement and Driver's engagement and interactions on the marketplace and driver ratings (including Driver Score).
- **Identification/verification data** such as driver's license, photo, and identity documents.
- **Offences data** such as data about criminal convictions and offences, where permitted under local laws and regulations.
- **Communication and correspondence records** such as:
 - When the driver engages with Our in-app chat ("Send a Message" option), or speaks with Our customer service agents, including the date and time of the communication, and its content.
- **User-generated content** such as:
 - Audio recordings generated during the trip (as part of Our safety toolkit trip audio recording feature, where such feature is available - for more information, please visit <https://bolt.eu/en/blog/audio-trip-recording-feature/>).
 - Any other content submitted like pictures, videos, or files in connection with a customer support request.

In addition to the above-mentioned sources, We may collect and receive your data from other sources, which include:

- Fleet partners;
- Service providers who conduct vehicle and driver compliance checks, and criminal background checks;
- Passengers and third parties who provide information and content in connection with the service or in regard to possible claims and disputes; and
- Users who participate in Our referral campaigns. In that case, We receive the referred person's information from that user.

2. Purposes of the Processing

We process driver's personal data for different purposes. The main purposes are as follows:

- For Our service provision, We collect and process personal data for the purpose of connecting passengers with drivers to help them move around more efficiently.
- For Our service provision, geolocation and driving routes are processed to analyze the geographical area and give suggestions to the drivers. If you do not want to disclose your geolocation for passengers, you must close the Bolt app or indicate in the Bolt app that you are offline and currently are not providing transportation services.
- Driver's license, profession, identity documents, and criminal convictions and offences are processed to determine the compliance with the legal requirements and the suitability of pursuing a profession as a driver.
- For Our service provision, the Bolt app displays the driver's photo, name, and vehicle details for the passengers to identify the driver and vehicle.
- You will receive summaries from the Bolt Driver Portal, which will include your efficiency and ratings as a driver. Summaries and ratings about drivers are necessary to provide reliable services for passengers.
- Personal data related to instant messages directly in the Bolt app is processed in order to provide service and customer support (including resolving disputes between driver and

rider), for security purposes as well as to improve Our products and services, and for analysis.

- We collect and use information about a driver's engagement and interaction on the marketplace, and their ratings to encourage user safety, ensure drivers comply with the Driver terms and conditions, and make sure We're providing a quality and enjoyable service to everyone.
- We may process all personal data about you for the establishment, exercise, or defense of legal claims.
- Please see additional purposes under legitimate interest (see Clause 3 below).

3. Legal Basis

Bolt mainly uses the following legal basis to process driver's personal data:

- **Performance of Contract:** Personal data is processed for the performance of the contract concluded with the driver. The prerequisite for the use of the Bolt services is the processing of driver's identification and geolocation data. In addition, in order to provide Our service to the driver, We process general data, vehicle data, usage data, and communications data.
- **Legitimate Interest:** Personal data (excluding special categories of personal data) may be processed on the ground of legitimate interest if We have concluded a legitimate interest assessment, including for the following purposes:
 - Investigating and detecting fraudulent payments, fraud, and other malicious or unlawful activities and/or safety or security incidents: general data, identification/verification data, communication data, and usage data may be processed.
 - Making recordings and logs: depending on your location, We may record messages and orders given both on the Bolt platform and/or using means of communication (e-mail, phone calls to customer support and riders, the Bolt app, etc.) as well as information and other activities We have performed. If necessary, We use these recordings for investigations, proof, and protection against claims, and/or for quality assurance.
 - Technical and cyber security reasons: for example, measures for combating piracy and ensuring the security of the service, website, Bolt platform, and app, as well as for making and storing back-up copies and preventing/repairing technical issues (depending on the issue, all data may be processed).
 - Establishing, exercising, or defending legal claims, including:
 - Supporting Our own internal investigations;
 - The assignment of claims and the use of debt collecting agencies; and
 - The use of legal advisors (depending on the claim, all data may be processed).

4. Recipients

- Your name and photo is disclosed to passengers, when you have received their order. When you have accepted the passenger's order, passengers will see driver's name, vehicle, phone number, photo, and geolocation data. Passengers also see driver's personal data in the receipt.
- Depending on the location of the driver, the personal data may be disclosed to Bolt and/or the Partner's local subsidiaries, representatives, affiliates, agents, fleet owners, etc. Processing of personal data will occur under the same conditions as established in this Privacy Notice.
- We may disclose information under a court order or where We cooperate with a data protection supervisory authority in handling complaints or investigations. We may also share your personal data with law enforcement or other public authorities (such as tax authorities), including responding to requests when the information is required by law or furthers a public interest task. In any scenario, We'll always satisfy ourselves that We have a lawful basis on which to share the information, and We'll make sure that We document Our decision.

5. Security and Access

- Any personal data collected in the course of providing services is transferred to and stored in the data centres of Zone Media LTD and/or Amazon Web Services, Inc., which are located in the territories of Member States of the European Union. Only authorised employees of Bolt group companies and Partners have access to the personal data and they may access the data only for the purpose of resolving issues associated with the use of the services (including disputes regarding transportation services).
- Please see Section 8 "Jurisdictional Disclosures" for details of the lawful basis that We rely upon in your country to transfer your personal data.
- Bolt group companies and Partners can access personal data to the extent necessary to provide customer support in the respective country, see more <https://bolt.eu/cities/>.

6. Processing Passengers' Personal Data

- You may not process the personal data of passengers without the permission of Us. You may not contact any passenger or collect, record, store, grant access, use, or cross-use the personal data provided by the passenger or accessible to you via the Bolt app for any reason other than for the purposes of fulfilling the transportation services.
- You must comply with the rules and conditions for processing of personal data of passengers as set forth in the Privacy Notice for Passengers (<http://www.bolt.eu/privacy/>). If you violate the requirements for the processing of personal data of passengers, We may terminate your driver account and claim damages from you.

7. Access, Correction, Retention, Deletion, and Data Portability

- Personal data can be viewed and corrected in the Bolt Driver Portal.
- As a data subject you may have the following rights:
- - You have the right to access and to request copies of your personal data.
 - You have the right to request that We correct any information that is inaccurate. You can change certain data yourself within the Bolt Driver Portal.
 - You have the right to request that We erase your personal data, under certain conditions (e.g., We are processing your personal data under your consent). Data that is processed pursuant to a legal obligation (including related to judicial proceedings or investigations) or where We have an overriding legitimate interest may not be deleted upon request.
 - You have the right to request that We restrict the processing of your personal data, under certain conditions (e.g., We are processing your personal data under consent).
 - You have the right to object to Our processing of your personal data, under certain conditions (e.g., We are processing your personal data under legitimate interest). You may submit an objection to any automated decision We have made, and ask that a person reviews it.
 - You have the right to request that We transfer the data that you have given Us to another organization, or directly to you, under certain conditions. This only applies to information you have given Us.
 - If We process your personal data using consent as a legal basis, then you have the right to withdraw your consent at any time (e.g., by unsubscribing or using privacy controls in the Driver Portal). Withdrawing your consent won't change the legality of processing done before withdrawal.
 - In cases where We use automated processing or profiling that has a significant effect on your rights, you may, under certain circumstances, have the right on grounds relating to your particular situation to object to the processing of personal data concerning you based on automated decisions/profiling and to require human intervention. You may also be entitled to an explanation regarding the logic of making an automated decision.
 - You have the right to file a complaint to the supervisory authority if you believe that We have processed your personal data unlawfully or have not complied with Our legal obligations. You may also have a right to seek a judicial remedy—see Section 8 of this Privacy Notice.
- Your personal data will be stored as long as you have an active driver's account. If your account will be closed, the personal data will be stored for an additional 3-year period.
- Data necessary for accounting purposes shall be stored for 7 years.
- In the event that there are formal investigations of a criminal offence, fraud, or false information having been provided, the data will be stored as long as necessary according to internal, legal, and regulatory requirements.
- In the event of disputes, the data shall be retained until the claim is satisfied or the expiry date of such claims.
- We respond to requests for deleting and transferring personal data submitted by e-mail within a month and specify the period of data deletion and transfer.
- The retention period for data about instant messages directly in the Bolt app messages is 90 days, except in cases where messages are related to a reported incident—in which case We will store them for 6 months.

- The retention period for audio recording data generated through Our Audio Trip Recording Feature is:
- - 24 hours, while stored locally on the device of the person who generates the recording. The recordings are automatically deleted after 24 hours if a report to Our customer support team is not created and the recording is not explicitly shared with Our customer support team as part of the report.
 - Recordings shared and investigated by Bolt will be automatically deleted after 7 days unless the retention period is manually extended for investigation/legal reasons.

8. Jurisdictional Disclosures

We may choose or be required by law to: (i) provide different or additional disclosures about Our data privacy practices; and/or (ii) process your personal data using a different legal basis other than Legitimate Interests, depending on your state or country of residence.

Country	Disclosures	Alternative Legal Bases
Dubai, United Arab Emirates (AE)	• In Dubai, Bolt is operated by a Partner. More information on this Partner is set out here. You can contact the Partner's Data Protection Officer at: compliance@dtc.gov.ae. The Partner's supervisory authority is the UAE Data Office. • We do not rely on Legitimate Interests in Dubai to process your personal data. We will instead rely on one or more Alternative Legal bases listed in this table, depending on the circumstance. • By agreeing to this Privacy Notice, you are consenting to Us sending you marketing communications. You can unsubscribe from these	• Consent by the Driver. • Performance of a contract. • Compliance with Legal Obligations. • Protection of your vital interests. • For any defence or initiation of any actions, claims or legal proceedings, or related to judicial or security procedures.

	communications at any time within the Bolt App. • By agreeing to this Privacy Notice, you are consenting to Bolt transferring (exporting) your personal data from Dubai to other Bolt Group Companies. However, the Partner operating the Bolt Platform in Dubai may from time to time store copies of your personal data locally in Dubai. • In Dubai you also have the right to request information regarding the procedures and measures in place to safeguard the transfer of your personal data.	
--	---	--

9. Dispute Resolution

- Disputes relating to the processing of personal data are resolved through customer support (info@bolt.eu) or by contacting Bolt's Data Protection Officer (privacy@bolt.eu). If a Partner operates the Bolt Platform in your country, the contact details of its Data Protection Officer or other assigned point of contact is provided in Section 8 'Jurisdictional Disclosures' above.
- Bolt's supervisory authority is the Estonian Data Protection Inspectorate (www.aki.ee) which can be contacted by email at info@aki.ee.

10. Making This Notice Great

We hope you have found this Privacy Notice easy to understand.

Data protection laws are important. They strengthen rules and enhance your information rights. Many of these rules may appear complicated, but most are grounded in common sense. We take Our responsibilities with your data seriously. Bolt (through its Partner where necessary) will continue to make changes to this Privacy Notice as part of Our commitment to protecting your privacy and affording you even more transparency.