Privacy Notice for Vehicle Owners (Tanzania)

At Bolt, we are focused on making cities for people. To do this, we offer a number of alternative transport solutions including rides, shared cars, e-bikes and scooters, and food and grocery delivery. Your safety is our priority and this includes the safety of your personal data that we process when you use the Bolt services (which includes the Bolt Platform and Bolt App).

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This Privacy Notice for Vehicle Owners provides information about how Bolt (T) Limited (Company Registration Number 139493) located at 13 Floor, Tanzanite Park Building, No. 38 Ursino, Ali Hassan Mwinyi Road, Kinondoni, Dar-es-Salaam, Tanzania ("**Bolt Tanzania**") processes personal data of Vehicle Owners on the Bolt platform. The Privacy Notice describes what data and why we process, how we keep personal data safe and what choices and controls are available to you. You can also find information about your privacy rights in this Privacy Notice. If you are a Vehicle Owner on the Bolt platform, please read this Privacy Notice as it contains important information about the processing of your personal data.

The terms “you” and “your” refer to an owner of a vehicle who lends, rents, borrows or otherwise provides their vehicle to a Bolt Driver for use on the Bolt App.

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. Controller Information and Contact Details

Bolt Tanzania is the controller of personal data of vehicle owners. The term "us" or "we" collectively refers to Bolt Tanzania and the owner of the Bolt App, Bolt Operations OÜ (“**Bolt**”), a private limited company, founded in the Republic of Estonia. More information about Bolt and its group companies, such as the relevant Bolt group company for your market, is set out here.

We have an appointed Data Protection Officer who can be contacted by email at privacy@bolt.eu.

2. Personal Data We Process

We process the following personal data that you provide to us:

- Your name, surname
- Contact details (phone number and email); and
- Information about your vehicle, such as: (i) your vehicle Logbook, which includes the following: vehicle make, model, year, chassis number, engine number, and license plate/registration number); (ii) your vehicle PSV inspection status (valid/invalid); and (iii) the insurance status of for your vehicle (valid/invalid and expiry date).

We collect and receive your data from the Bolt Driver during account registration or account changes administration.

3. Purposes of the Processing

In order to fulfil our commitment to safety and in order to comply with our legal obligations, we collect and process personal data provided by you as an owner of a vehicle used on the Bolt App, during the registration and onboarding of new Bolt Drivers. We may also process your personal data to verify and validate existing Bolt drivers.

The primary purposes for processing your data are to:

- Confirm ownership of vehicles used on the Bolt App;
- Confirm the public service vehicle (PSV) status of vehicles used on the Bolt App;
- Validate that Bolt drivers are driving a vehicle that is registered with the relevant local transport authority;
- Validate that the vehicle used by a Bolt driver has been authorised by its owner;
- Verify the identity of Bolt drivers, by assessing whether they are driving a recognised vehicle;
- Contact you, as a vehicle owner, and provide assistance to local authorities in the event of an emergency or incident involving your vehicle on the Bolt App; and
- To otherwise prevent issues such as driver impersonation and unauthorized vehicle sharing.

For our service provision, the Bolt App also displays vehicle details for Bolt Passengers to identify Bolt Drivers and vehicles.

Where personal data is processed for a new purpose other than that for which the personal data are originally collected and the processing is not based on your consent, we carefully assess the permissibility of such new processing. We will, in order to ascertain whether processing for a new purpose is compatible with the purpose for which the personal data are initially collected, take into account, inter alia:

- any link between the purposes for which the personal data are collected and the purposes of the intended further processing;
- the context in which the personal data are collected, in particular regarding the relationship between you and us;
- the nature of the personal data, in particular whether special categories of personal data are processed or whether personal data related to criminal convictions and offences are processed;
- the possible consequences of the intended further processing for you; and
- the existence of appropriate safeguards, which may include encryption or pseudonymisation.

4. Legal basis

Legitimate interest: we may process your personal data on the grounds of legitimate interest for the following purposes:

- To protect the safety of our users on the Bolt App (by conducting driver and vehicle verifications);
- To contact you with relevant offers, promotions and opportunities relating to your vehicle or its use on the Bolt platform, where permitted by applicable law. You may opt out of receiving these communications at any time.
- To investigate and detect fraudulent and/or other malicious activities on the Bolt App, which your vehicle may be involved in; and
- To establish, exercise or defend legal claims, or instruct our legal advisors.

Legal obligation: we may process your personal data to comply with legal obligations in your country, including during the investigation of a crime by law enforcement, or during a security or emergency incident involving your vehicle. We may also disclose your personal data under a court order or where we cooperate with a regulator or public authority in handling complaints or

investigations. In any scenario, we will always make sure that we have a lawful basis upon which to share your data, and we will make sure that we document our decision.

Vital interests: we may process your personal data in order to protect the vital interests of a Bolt Driver who uses your vehicle, or the passengers in your vehicle.

5. Recipients

- **Verification provider**: Your personal data is shared with a local third party verification service provider who helps Bolt verify the validity of your vehicle ownership documentation and the compliance status of your vehicle.
- **Local authorities**: Your personal data may be disclosed to local authorities, including to police services during an investigation involving a Bolt driver or an incident involving your vehicle. We will always ensure that we have a lawful basis to share this information before doing so.
- **Bolt**: Your personal data may be disclosed to other Bolt Operations OÜ entities, representatives, affiliates, agents, etc. Processing of personal data by another Bolt entity will occur under the same conditions as established in this Privacy Notice.
- When transferring your personal data to third parties, including outside of your country, we comply with applicable data protection requirements.

6. Security and access

- Personal data collected in the course of our vehicle verification process may be 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 Operations OÜ group companies and partners have access to the personal data and they may access the data only for the purpose of resolving safety issues associated with the use of the services.
- We require the recipients of your personal data to implement appropriate and reasonable technical and organizational security measures to protect your personal data from unauthorized access, use, disclosure, alteration, or destruction.
- We process your personal data in a responsible manner where we are able to demonstrate the compliance of personal data processing with the purposes set and the applicable regulations. All our processes, guidelines and activities related to personal data processing are based on the following principles: lawfulness, fairness, transparency, purposefulness, minimisation, accuracy, storage limitation, integrity, confidentiality, and data protection by default and by design.

7. Access, correction, retention, deletion and objection

As a data subject you have following rights:

- The right to access and to request copies of your personal data.
- The right to request that we correct any information that is inaccurate.

- The right to request that we erase your personal data, under certain conditions. Please note that personal data that is processed pursuant to a legal obligation or where we have an overriding legitimate interest will not be deleted upon request.
- The right to object to our processing of your personal data, under certain conditions.
- If we process your personal data using consent as legal basis, then you have the right to withdraw your consent at any time. Withdrawing your consent won't change the legality of processing done before withdrawal.
- The right to file a complaint to the Personal Data Protection Commission (PDPC) of Tanzania.
- If you make a data subject request, we have one month to respond to you. If you would like to exercise any of these rights or need more information on your rights, contact us at privacy@bolt.eu. Please note, that there may be certain preconditions of fulfilling your request. In addition, we may need to identify you before granting you any of the rights connected to your personal data.

8. Retention

Your personal data will be stored by us for as long as your vehicle is active on the Bolt App.

We will also retain your personal data for a longer period of time if we are required to do so by law, or if we believe that it is necessary to protect our rights or interests, including:

- Data necessary for accounting purposes, which shall be stored for 7 years;
- In the event of suspicions of an administrative or criminal offence, fraud or false information, in which case the data shall be stored for up to 10 years;
- In the event of disputes, in which case the data shall be retained until the claim is resolved or until the expiry date of such claims; and
- In respect of recorded calls, which shall be stored for a period of 1 year.

9. Direct Marketing

We may send direct marketing messages to your e-mail address and/or phone number when you have given us permission to do so, or under a soft opt-in basis. We may personalise direct marketing messages using information on how and where you use Bolt's services, such as how frequently you use the Bolt App, and your transportation preferences, where applicable.

If you no longer wish to receive direct marketing messages, please click the "Unsubscribe" link in the footer of one of our emails, or opt-out in the profile section of the Bolt App. Easy.

10. 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).

The Personal Data Protection Commission (PDPC) of Tanzania can be contacted at https://pdpc.go.tz/.

11. Changes

This Privacy Notice applies to vehicle owners' personal data processing done by us. We have the right to unilaterally amend this Privacy Notice. We will notify you of all important material changes on our website.