At Bolt, we are focused on making cities for people. To do this, we offer a number of alternative mobility and delivery solutions including ride-hailing, carsharing, e-bikes and e-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 Bolt services (which includes the Bolt Platform and Bolt App).
Date when this Privacy Notice was last updated: 31.01.2025

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1. About this Privacy Notice

This Privacy Notice (“Notice”) describes how Bolt Operations OU (“Bolt”, “We” or “Us”) and its group companies and third party partners collect and use the personal data of persons using e-vehicles, including e-scooters and e-bikes via the Bolt App, known as “Riders”. The term “you” or “your” refers to a Bolt Rider. More information about Bolt and its group companies, such as the relevant Bolt group company for your market, is set out here.
This Notice lets you know how we promise to look after your personal data and tells you about your privacy rights and the choices and controls available to you.
This Notice applies to all individuals globally who use the Bolt Platform to request and receive micromobility rental services (e-scooters and e-bikes) via the Bolt App. This Notice should be read in combination with all terms and conditions, guidelines and policies that apply to your use of the Bolt Services as are made available for your market at https://bolt.eu/legal.

2. How do you contact us?

Bolt (or the relevant Bolt group company for your market - as set out here in more detail) is the data controller of your personal data processed under this Notice. We have appointed a Global Data Protection Officer and an Office of the Data Protection Officer Team who can be contacted by emailing our Privacy Mailbox at privacy@bolt.eu - please mark the subject line of the email '*For the attention of Bolt's Data Protection Officer*'. You can also raise any privacy-related questions by contacting our Customer Support Team in-app when you go to the main menu and tap 'Support', the Customer Support Team will then forward the issue internally to Bolt's Privacy Legal Team. You can request a copy of your personal data directly via the app. To find the access option, go to the menu and tap your name > Privacy > Your personal data.

3. What personal data do we process?

We collect and process personal data;

- provided by you to Bolt;
- when you use the Bolt Services; and
- from other sources such as authorised third parties who administer services on behalf of Bolt, and in some countries, governmental or public databases.

The table below sets out the different categories of personal data we process about you.

Category of Personal Data	**Description of Personal Data**
Personal Data provided by you to Bolt	
Profile Data	We collect personal data about you when you register to access the Bolt Platform and/or use the Bolt App including: ● Full Name ● Email address ● Login name and password ● Phone number ● Profile photo (optional) ● Home or work address ● Saved addresses (optional) ● Date of birth ● Preferences and settings related to the account, such as language preferences, communication preferences and notification settings, and privacy settings
Payment Data	We collect details of your payment methods including bank name, bank account number, bank account sort code, credit or debit card information, related payment verification information and transaction history on the Bolt

	Platform.
Identification / Verification Data	We collect identification documents when we need to verify your identity. This includes government-issued or national identity documents (such as passports, IDs or driving licences) and photographs/pictures (such as a selfie) you submit yourself.
Demographic Data	We collect demographic data such as your age and gender.
Survey / Interview Data	We collect demographic data about you and the content of your replies or attachments you may send us, during the course of surveys and interviews.

Personal Data we collect about you when you use the Bolt App

Geolocation Data	We collect data about your precise and/or approximate geolocation (including GPS, and IP address) from your mobile device depending on your app settings and device permissions, when you open and use the Bolt App. We also track the precise location of e-scooters and e-bikes at all times and the location of nearby e-scooters and e-bikes to you, as well as the place where you want to start your journey, the time of day, the journey progression and the final destination of your trip. This data is collected only when the Bolt App is activated. The collection of geolocation data stops after closing the Bolt App. You may use the Bolt App without enabling collection of geolocation data from your mobile device. This may affect some features on the App and you may have, for example, to enter your pickup address.
App Usage Data	We collect personal data via the Bolt App about your use of the Bolt App. This includes: details of rides (date and time, start point and final destination point and geo coordinates, trip distances and routes, e-vehicle type, order price and currency), order history (including order status, payment history (including whether you used any coupons or promotional codes), cancellation history, dates and times you log-in and log-off the Bolt App and app

	features or pages viewed, browser type, app crashes and other system activity. Our e-bikes and e-scooters may collect sensor data, such as speed, direction, orientation, acceleration, and other technical data.
E-vehicles sensors Data	Through the e-vehicle sensors we collect telematics information such as e-scooters and e-bikes speed, engine power and information on your riding behavior including speeding, sudden braking or skidding and the total weight of objects and person(s) on the e-vehicle and changes in the weight.
Communication Data	We collect communication and correspondence data when you engage with our Customer Support Team via the in-app chat function, report an incident (including any accident, crash, damage, personal injury, stolen or lost e-vehicle), communicate via emails, web forms, or speak with our Customer Support agents. We record the date and time of the communications and its content and your phone number (where you use the call feature). We will record calls, only where you are notified in advance that the call may be recorded.
User Generated Data	We collect personal data when you submit any content like photos of parked e-vehicles, selfies for helmet use validation, videos, files in connection with a customer support request. This also includes metadata relating to the method you use to communicate with Bolt.
Reckless Rider Score	Reckless Rider Score is a score calculated from different inputs that each e-vehicle measures, which includes tandem riding, irresponsible parking, repeated abrupt, speeding, braking and skidding. Each of these behaviours is marked in the system with points, with the Rider's riding behaviour being evaluated every five rides.
Warning and Suspension Data	We collect details of warnings and suspensions that have been issued to a Rider. This includes: the date(s) on which warnings or suspensions have been issued and the date of expiry of a warning or suspension.
Device Data	We collect data about the devices you use to access the Bolt App, including the hardware model, device IP address and other unique device identifiers (such as your UUID and

	advertising identifiers), device operating system, browser version, device vendor name, app version, identity of carrier and manufacturer and preferred languages.
Cookies, SDKs, Analytics, and Third-Party Technologies	We collect information through the use of cookies, tracking pixels, data analytics tools, SDKs, and other third-party technologies like advertising IDs to understand how you navigate through the Bolt App, to make your experience safer, to improve your site and Bolt App experience, to serve you better ads on other sites (according to your marketing preferences), and to save your preferences. For more information about cookies, see our Cookie Declaration.
Personal Data we collect about you from other sources	
Contact Data	We collect contact data about you: when you connect to the Bolt App via a third party service such as LinkedIn, Facebook or Twitter, when another Rider refers you through our referral campaigns or if you use the Bolt App through your employer's Bolt Business account. This includes your: ● Full name ● Email address ● Phone number

4. What purposes do we use your personal data for and what is our legal basis for processing?

The table below sets out:

- our purpose for processing your personal data;
- our legal grounds (known as a **'legal basis'**) under data protection law, for each purpose; and
- the categories of personal data we use for each purpose. Learn more about what personal data these categories include in Section 3 "*Personal Data that we process about you*" above.

Here is a general explanation of each 'legal basis' that Bolt relies on to process your personal data to help you understand the table below:

- **Performance of a Contract:** When it is necessary for Bolt (or a third party) to process

your personal data to provide you with the Bolt Services we promised you and meet our obligations under Bolt E-Vehicles Global Terms of Service Where the legal basis for processing your personal data is performance of a contract, and you choose not to provide the information, you may be unable to use the Bolt Services.

- **Legitimate Interests:** When we process your personal data relying on legitimate interest grounds. This includes our commercial and non-commercial interests in providing an innovative, personalised and safe service to you, other Riders, and other third parties. Where the table below states that we rely on legitimate interests, we have provided a brief description of the legitimate interest. If you would like more information about this (including the balancing test), please contact us using the methods set out in Section 2 "*How do you contact us?*" above. In countries where legitimate interest is not an available lawful basis for Bolt's processing activities, we will instead rely on an alternative valid legal basis.
- **Consent:** When we ask you to actively indicate your agreement to our use of your personal data for a certain purpose of which you have been informed of. Where we rely on consent to process your personal data, you can withdraw your consent to such activities at any time. Withdrawal of the consent does not affect the lawfulness of any processing which took place prior to you giving your consent to us.
- **Compliance with Legal Obligations:** When we must process your personal data to comply with a law or regulation in the markets we operate in, such as to comply with our licensing conditions and our obligations under tax and accounting laws. Where the legal basis for processing your personal data is compliance with legal obligations, and you choose not to provide the information, you may be unable to use the Bolt Services.

Purpose of processing	**Legal Basis**	**Categories of Personal Data**
For the provision of the Bolt services		
To create, update and maintain your Bolt account	• *Performance of a Contract*	• Profile Data • Device Data
To authenticate your account and verify your identity We collect information to verify who you say you are and to verify your age and eligibility for a Bolt account, when required by local law. Bolt service is aimed only towards users who are no less than 18 years old and legally authorised to ride e-scooters according to applicable legislation. When the feature is enabled, users who try to rent an e-scooter and who have not been previously age-verified will be presented with the age	• *Performance of a Contract* • *Compliance with Legal Obligations* • *Legitimate Interests* - It is in our interest to prevent and address unauthorised uses of Bolt accounts and violations of Bolt E-Vehicles Global Terms of Service	• Profile Data • Identification / Verification Data • Device Data • Geolocation Data • App Usage Data

Purpose of processing	Legal Basis	Categories of Personal Data
verification screen. They will be asked to select their identity document and take a picture of it. After a couple minutes to a couple seconds, their document will be checked and they will be told the outcome. When we ask you to verify your identity and you are not able to verify, the Bolt service will be suspended until the verification process is completed.		
To enable, improve and customise the micromobility rental services and other services/features We get you to where you want to go by matching Riders with available e-vehicles. We use Geolocation Data to help you find available e-vehicles and verify the location of the e-vehicles. Refusing to share Geolocation Data via the Bolt App could potentially prevent us from fulfilling the contract with you and means we cannot direct you to the location of the e-vehicle.	● *Performance of a Contract*	● Profile Data ● Geolocation Data ● App Usage Data ● Device Data
To make sure your ride goes smoothly We use Geolocation Data to make sure you get to your destination and data on the routes taken during the ride to analyse geographic coverage, monitor parking and operational areas. Bolt processes the start and end positions of e-scooters and, if applicable, the positions of interim interruptions to the ride in order to analyse and optimise the use of the e-scooter fleet.	● *Legitimate Interests* - It is in our legitimate interests and in the interests of our Riders to offer the most convenient ride.	● Geolocation Data ● App Usage Data

Purpose of processing	Legal Basis	Categories of Personal Data
This lets us improve recommendations about the most efficient routes and facilitate your ride in the best possible way. This also helps Bolt to make sure that e-scooters are in the most convenient locations for Riders. We also collect App Usage Data and Geolocation Data to document the ride starts and ends in order to resolve quality issues related to your use of the services and the Bolt App.		
To make sure the Bolt App works optimally We use your contact details to notify you of updates to the Bolt App so you can keep using the Bolt services. We also use Device Data and App Usage Data to ensure you can connect to the Bolt App and to help keep your account safe through authentication and verification checks.	● *Performance of a Contract* ● *Consent* - Your opt-in consent is required for the use of Cookies, SDKs, Analytics, and Third-Party Technologies Data.	● Profile Data ● Device data ● App Usage Data ● Identification / Verification data ● Cookies, SDKs, Analytics, and Third-Party Technologies Data
To calculate prices and process payments We collect Payment Data to process and enable payments and Geolocation Data to calculate prices and bill correctly based on your pick-up and drop off of an e-vehicle.	● *Performance of a Contract*	● Payment Data ● Geolocation Data
To maintain the fleet and detect any damage to the e-vehicles We use Geolocation Data as we need to know where you choose to drop off an e-vehicle so we can recharge batteries and maintain our fleet. We also use e-vehicle sensors data as we need to detect any damages and to check the	● *Legitimate interests*-It is in our interest and in the interest of our Riders to provide a high quality service by maintaining and protecting Bolt's fleet properly.	● Geolocation Data ● E-vehicle sensors data

Purpose of processing	Legal Basis	Categories of Personal Data
condition, performance and functionalities of the e-vehicles to ensure that each e-vehicle is in good working condition and available for each Riders' reservation. We also need to be able to locate the e-vehicles in the event of theft or suspected theft or in the event of a suspected incident or accident.		
To administer the use of and payment for the Bolt Services you are offered by your employer (a Bolt Business Client) We collect your Contact Data if you use the Bolt services through your employer who is a Bolt Business Client, and in addition we process and share with them the start and final destination points of your ride, and a timestamp of the ride.	● *Legitimate Interests* - It is in our interest and in the interest of our Business Clients, to facilitate the use of our services through Bolt Business accounts and process your personal data for the provision and payment of these services.	● Contact Data ● App Usage Data
To get your feedback on your level of satisfaction with the Bolt Services through surveys and interviews These surveys and interviews are designed to understand your feedback on the Bolt services, to measure customer satisfaction and perception of safety and enable us to make informed decisions and take actions to improve the experience. The Survey and Interview Data may be shared with research partners we use to understand your feedback.	● *Consent* - Your opt-in consent will be required. ● *Legitimate Interests* - It is in our interest and in the interest of our Riders to provide a satisfying rider experience.	● Profile Data ● Demographic Data ● Survey/Interview Data
To determine your eligibility to discounts and other offers We may partner with select cities to provide discount programs and other offers for	● *Consent* - Your opt-in consent will be required.	● Profile Data ● Identification / Verification data

Purpose of processing	Legal Basis	Categories of Personal Data
micromobility rental services. If you wish to apply for offers available to you, we may ask you to provide identification documents to confirm your eligibility.		
For customer support		
To provide customer support services and receive and process feedback We process your personal data to investigate and address your queries including reported safety incidents/alleged criminal acts and complaints. We also use the data you share to address quality issues and to improve the Bolt services. For safety related incidents, your Reckless Rider Score Data will only be reviewed by Bolt's Customer Support and/or Safety Teams when investigating a safety/criminal incident on the Bolt Platform involving you. We may use automated processes for complaint resolution purposes via our automated chat function. For further information regarding how to object to the above activities, please see Section 9 "*What are your rights?*" below.	● *Performance of a Contract* ● *Legitimate Interests* - It is in our interest and in the interest of our Riders to support them throughout their use of the Bolt services and continuously improve and develop the customer support we provide. In addition it is in our interest and interest of our Riders to address threats and abuse and promote safety, integrity and security on the Bolt Platform to ensure our services are used in accordance with the Bolt E-vehicles Terms of Service. ● *Compliance with Legal Obligations* - We process personal data to comply with our legal obligation to cooperate with law enforcement when there is a safety incident.	● Communication Data ● User Generated Data ● Warning and Suspension Data ● Reckless Rider Score Data
For safety and security		
To enable and provide safety features We use data to ensure Bolt's Services are secure and have implemented a variety of safety features to enhance the safety of our Riders, including:	● *Legitimate Interests* - It is in our interest and in the interests of our Riders to enhance the safety, security and integrity of Bolt's services by offering safety functionalities	● Profile Data ● E-vehicles sensors Data ● Reckless Driver Score ● Geolocation Data ● App Usage Data ● User Generated Data ● Communication Data

Purpose of processing	Legal Basis	Categories of Personal Data
- *Tandem riding detection* We collect data to detect and prevent riding e-scooters by more than one person (tandem riding) and reduce the number of accidents and collisions with pedestrians. The data collected is limited to the data from the accelerometer about motor force and forward acceleration.The coefficient calculated based on those metrics is the indication whether the end user rides the e-scooter alone or with another person. - *Reckless driving detection system* We developed the Reckless Rider Score feature to improve the safety of e-scooter riders and other road users. We collect data through the e-vehicle sensors to detect reckless driving behaviour and encourage safer driving practices and if necessary to send notifications to the Riders. Our internal monitoring system tracks each event, i.e. skidding, abrupt braking, tandem riding, speeding, bad parking and collisions, that occurs whilst a Rider is using an e-scooter. - *Reporting poorly parked e-scooters* We collect data to monitor if an e-scooter is parked in an unreachable location, at a bus stop or on private property, if it blocks a pathway or emergency exits or if it is left lying on the ground. We collect sensor and telematics data that identifies		● Device Data

Purpose of processing	Legal Basis	Categories of Personal Data
an overturned e-vehicle and flags the e-vehicle to Bolt Patrol, an ad hoc unit that has a preventive role in identifying and correcting improper parking. Additionally, our real-time tracking system monitors any possible e-scooter vandalism or theft attempts, automatically alerting the Bolt Patrol and broader operational teams. Moreover, users and non-users can send us messages via our customer support, an in-app button, or online to report a poorly parked e-scooter. - *ParkIAssist* We collect parking photos submitted by the Riders after the ride. In some countries, our Customer Support team is reviewing parked photos on a daily basis. In other countries, where our AI ParkAssist+ is enabled, an AI parking verification feature analyses a Rider's end-of-ride picture and prevents them from finishing a ride in case of poor parking. The feature ensures that e-scooters are parked correctly as it gives Riders instant feedback on how they parked the e-vehicle. In case of poor parking, a rider receives in-app guidelines on re-parking correctly and can only finish the ride after providing a picture of an e-scooter/e-bike parked per local regulations. We've been promoting good parking habits by introducing		

Purpose of processing	Legal Basis	Categories of Personal Data
e-scooter parking guidance, launching Bolt charging docks, and educating our Riders. - *Drunk driving test:* It's a simple micro coordination game that measures a Rider's reaction time and compares it to the benchmark. If the Rider wins the game (based on his reaction time results), they can proceed to reserving an e-vehicle. If the Rider fails the game (doesn't pass the average reaction benchmark), they can play again or request a ride-hailing service. - *Onboard cameras*: As part of our commitment to ensure safety of e-scooter riders, we use camera-based detection features on our e-scooters. These features may involve the processing of visual data captured by onboard cameras to identify potential hazards, such as pedestrians and obstacles, in the vicinity of our e-scooters. We process this data for sidewalk, bike lane, pedestrian and improper parking detection. This enables us to take proactive measures to minimise the risk of accidents or collisions and create a safer environment for everyone sharing the road.		
To issue warnings, speed limitation and temporary suspensions due to reckless driving detection. When you use our Bolt e-scooters, we process your personal data collected via the sensors of the e-scooter to ensure you are using our	● Legitimate interests It is in our interest and in the interest of our users to ensure and to enforce our services are used in accordance with Bolt E-Vehicles Terms of Service.	● Communication Data ● E-vehicles sensors Data ● Reckless Driver Score ● Geolocation Data ● App Usage data

Purpose of processing	Legal Basis	Categories of Personal Data
services in a safe and secure manner. If we detect any potentially dangerous behaviour then we will issue you with a warning in the Bolt App to encourage you to refrain from using the e-scooter in a certain way. There are three levels of warnings: ● first warning - informs the Rider about the risks of misbehaviour; ● second warning - limits the speed of the e-scooter until the overall reckless driving score improves; and ● third warning - temporarily suspends the Rider from the service. The Rider is able to contest the suspension by contacting our Customer Support Team for further information as to why their access to micromobility rental services was suspended. We may use the help of automated processes in case of issuing warnings and suspensions for reckless driving. Bolt does not completely suspend though a Rider account due to reckless driving. The automated system either issues a warning, temporarily limits the speed of the e-scooter, or temporarily prohibits the Rider from driving e-vehicles. For further information regarding how to object to the above activities, please see Section 9 "*What are*		

Purpose of processing	Legal Basis	Categories of Personal Data
your rights?" below.		
To prevent, detect, investigate fraudulent accounts, fraudulent payments or other unlawful use of our services and malicious activities and apply suspensions and blocks, as needed Our automated anti-fraud system will identify fraudulent accounts, payments and other malicious activity on the Bolt Platform, like for example when you top up your balance, start or finish a ride, or go through authentication processes. For example, to enable us to investigate, a temporary suspension may be applied to a Bolt Account when we detect that the Rider is requesting a high amount of requests that are not humanly possible indicating a potential denial of service attack is taking place. While Bolt may use automated processes for fraud detection purposes, decisions to permanently block a Rider are taken following human review by our staff, and no account is blocked automatically without first undergoing a verification process. For further information regarding how to object to the above activities, please see Section 9 "*What are your rights?*" below.	● *Legitimate Interests* - It is in our interest and in the interests of our Riders to detect, prevent and address fraud, unauthorised use of Bolt accounts or other harmful or illegal activity and maintain the safety and security of our systems, by responding to suspected or actual criminal acts. It is also in our interests to prevent and address violations of Bolt e-vehicles Terms of Service.	● Profile Data ● Identification / Verification Data ● Device Data ● Geolocation Data ● Payment Data ● App Usage Data ● Communication Data

Purpose of processing	Legal basis	Categories of personal data
For marketing and advertising		
To market and advertise Bolt services and those of	● *Legitimate Interests* - It is in our interest and in the	● Contact Data ● AppUsage Data

partners according to your preferences and measure the effectiveness of Bolt's ads This includes using your personal data to send emails, text messages (including WhatsApp messages), push notifications, in-app messages and other communications marketing Bolt's products, services, features, offers, promotions, sweepstakes, news and events of Bolt and our partners. In addition, we will analyse, aggregate your App Usage Data and provide it to you in a summarised way each year for the wrap-up marketing campaign connected to the End of Year campaign. We use pixels and similar technologies to track which emails are opened and which links are clicked by you, to help us measure the results of our campaigns. We may also share your personal data with third parties, or collect data regarding your visits and actions on third-party apps or websites, for the purposes of personalised ads.	interest of our Riders to inform them about Bolt services and features or those offered by Bolt partners. It is also in our interest to promote and advertise our services, including engaging in contextual (non-data driven) and personalised advertising, analytics, and measurement of ad performance, in order to expand our user base by deepening relationships with existing Riders and developing new ones. You can opt out of these communications at any time by clicking the 'unsubscribe' link at the bottom of our emails, typing "STOP" for messages and SMS, or updating your communication preferences in your account settings. ● *Consent* - Your opt-in consent will be required for example, when the law requires consent for email marketing and for certain tracking technologies.	● Device Data ● Cookies, SDKs, Analytics, and Third-Party Technologies Data
Purpose of processing	**Legal basis**	**Categories of personal data**
For service communications		
To communicate with you, including sending you service-related communications and to keep you informed Your name, phone number and email address will be used to communicate with you to let	● *Performance of a Contract*	● Profile Data

you know that your ride has been completed, to send you trip confirmation emails and receipts, and to let you know about important service updates.		
Purpose of processing	**Legal basis**	**Categories of personal data**
For research and improvement of the Bolt services		
To perform research, testing, and analytics to better understand and improve our business and the Bolt services For example, we use Geolocation Data and App Usage Data to perform research and improve our algorithms, machine learning, and other modelling. We use Communication Data related to incidents to monitor our security practices and improve our operations and processes.	• *Legitimate Interests* - It is in our interest to measure the use of our services in order to inform business decisions and to enable provision of accurate and reliable reporting and to continuously improve and develop the Bolt services we provide. • *Consent* - For certain analytics we may require your consent. If so, you'll be prompted to provide consent for specific purposes and processing activities, with details on how to withdraw consent, including through your profile settings.	• Geolocation Data • App Usage Data • Communication Data • User Generated Content • Device Data
To develop new products, features, partnerships and services	• *Legitimate Interests* - It is in our interest and in the interest of our Riders to develop and adopt new features to improve the Bolt Platform.	• Profile Data • Geolocation Data • App Usage Data • Communication Data • User Generated Content • Device Data
To prevent, find, and resolve software or hardware bugs and issues	• *Legitimate Interests* - It is in our interest and in the interest of our Riders to provide a hassle free and reliable service.	• Profile Data • Geolocation Data • User Generated Content • Communication Data • Device Data • App Usage Data
Purpose of processing	**Legal basis**	**Categories of personal data**
For legal proceedings and compliance		

with the law		
To investigate and respond to claims and disputes relating to the use of Bolt services, to manage insurance and/or necessary for compliance with applicable legal requirements or with requests from government/law enforcement bodies Depending on the claim, all Data may be processed for establishing, exercising or defending legal claims, including: ● supporting our own internal investigations and investigations conducted by insurance companies; ● the assignment and management of claims and the use of debt collecting agencies; and ● the use of legal advisors. In some circumstances, we are legally obliged to share information with external recipients. For example, under a Court Order or where we cooperate with a data protection supervisory authority in handling complaints or investigations or in the event of damage to our e-vehicles or of accidents involving our e-vehicles, we need to share information with insurance companies for claims settlement. We also respond to requests, such as those from law enforcement agencies, when the response is required by law or furthers a public	● *Compliance with Legal Obligations* - We process personal data to comply with an obligation, when there is a request from a regulator, law enforcement or other governmental body. ● *Legitimate Interests* - In the context of litigation or other disputes, it is in our interest to protect our interests and rights, our Riders or others, including as part of investigations, regulatory inquiries, insurance claims or litigation.	● All Data

interest task such as an emergency situation or where someone's life is at risk. We will take steps to ensure that we have a lawful basis on which to share the information, and we'll make sure that we document our decision.		
To fulfil our tax obligations and comply with tax legislation	● *Compliance with a Legal Obligation*	● Profile Data ● Payment Data ● App Usage Data
To reorganise or make changes to our business	● *Legitimate Interests* - It is in our interest to process personal data for organisational and business planning purposes.	● All Data
To ensure the security of the Bolt services (including the Bolt Platform and Bolt App) Depending on the issue, all Data may be used for 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.	● *Legitimate Interests* - It is in our interest and in the interest of our Riders to protect, guard and maintain Bolt's security systems, respond to suspected or actual criminal acts and repair any technical issues.	● All Data

When we process your personal data for a new purpose different from the purpose your personal data was originally collected for and we haven't asked for your consent, we will have to ensure that this new purpose is compatible with the initial purpose we collected it for.. We will take into account any link between the two purposes and decide if the personal data can be used for this new purpose. Otherwise, we will take appropriate steps to ask for your consent or refrain from processing your personal data.

5. Who do we share your personal data with?

We may share your personal data with the following categories of recipients.

Category of Recipients	Description
Bolt Group Companies and partners	We may share your personal data with our Bolt Group Companies (including Bolt local subsidiaries), third party partners, their affiliates and representatives, who may similarly use your personal data in the manner described in this Notice. If Bolt local subsidiaries are responsible for processing your personal data, they may share your personal data with Bolt Operations OU as the main data controller for Bolt.
Rides requested or Paid by Bolt Business Clients or others	Some rides you take may be requested or paid for by others. If you take one of those rides using the Bolt Business Profile account of your employer, a code or coupon, a corporate credit card linked to another account, or another user or entity otherwise requests or pays a ride for you, we may share your ride details with that other party, including your name, phone number, the date, time, charge, and pick up and drop off locations of your ride. The data shared with Bolt Business Clients will be disclosed via reports they can access on their Business Accounts. Processing of personal data will occur under the same conditions as established in this Notice.
Referrers	If you refer someone to the Bolt App, we will let them know that you generated the referral. If another user referred you, we may share information about your use of the Platform with that user. For example, a referral source may receive a bonus when you join the Bolt App or complete a certain number of rides and would receive such information.
Promotional, marketing and strategic partners	We may share limited data like your email address with our promotional, marketing and strategic partners so that they can inform you about promotional events and provide you with information and marketing messages about products or services that may interest you. In addition, we may share your personal data with marketing platform providers, including social media advertising services, advertising networks, third-party data providers, to reach or better understand our users and measure the effectiveness of our ads on other platforms and with social media platforms, including Facebook

Category of Recipients	Description
	and Google, for sign-in purposes.
Third Party Service Providers	Our third party vendors and other service providers and contractors have access to your personal data to help carry out the services they are performing for us or on behalf of us. This may include vendors and providers who provide email or moreover electronic communication services, tax, legal and accounting services, product fulfilment, background checks and identity/verification processes, payment processing, customer support, fraud prevention and detection, data enhancement, web hosting and cloud storage, research, including surveys, analytics, crash reporting, performance monitoring and artificial intelligence, machine learning and statistical services. In addition, we will share data like your geolocation and the ride routes with Google in connection with the use of Google maps in our apps.
Insurers	We will share your data with insurers, where you, or a family member in your absence, request for a claim to be processed, for the purposes of facilitating the processing of insurance claims and for reporting purposes due to contractual requirements from the insurers. We will also share data with insurers, for the purposes of claims management and settlement to avert further damage to us.
Other third parties	In the event of a likely change of control of the business (or a part of the business) such as negotiations for a sale, an actual sell, a merger, and acquisition, or any transaction, or reorganisation, we may share your personal data with interested parties, including as part of any due diligence process with new or prospective business owners and their respective professional advisers. We may also need to transfer your personal data to that third party or re-organised entity after the sale or reorganisation for them to use for the same purposes as set out in this Notice.
Law Enforcement	We may disclose information under a court order or where we cooperate with a data protection supervisory authority in handling

Category of Recipients	Description
	complaints or investigations. For example, we may also share your personal data with law enforcement or other public authorities, including responding to requests when the information is required by law or furthers a public interest task. In any scenario, we will take steps to ensure that we have a lawful basis on which to share the information, and we'll make sure that we document our decision.

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, please be aware that those websites may have their own privacy notices and that we do not accept any responsibility or liability for their notices or their processing of your personal data. Please check these notices before you submit any personal data to such third-party websites.

6. Does Bolt transfer your personal data to other countries?

We operate internationally and as a result, your personal data may be transferred to, stored and/or processed by Bolt Group Companies, subcontractors and partners when undertaking the activities described in this Notice outside the country where you are located. Please see our Bolt Group Companies table for details of the countries where your personal data may be transferred to within the Bolt Group.

When we transfer your personal data outside of a country or region, such as the European Economic Area ("EEA"), we will make sure that we take steps necessary to comply with applicable legal requirements and rely on the following transfer mechanisms:

- **Adequacy Decisions**: We will rely on decisions from the European Commission where they recognise that certain countries and territories outside of the European Economic Area ensure an adequate level of protection for personal information. Please click here to see the list of countries deemed 'adequate' by the European Commission and click here to see the list of countries deemed 'adequate' by the UK Government. We rely on these adequacy decisions when we transfer personal data we collect from the EEA and the United Kingdom to the United States (where some of our third party service providers are based).
- **Standard Contractual Clauses (SCCs):** We will utilise standard contractual clauses approved by the European Commission for transfers outside the EEA and by the UK Government for transfers outside of the United Kingdom. Please click here to see the EEA SCCs and click here to see the UK SCCs. We will rely on SCCs when we transfer personal data we collect from the EEA and the United Kingdom to the United States, Singapore and Nigeria where some of our third party service providers are based.

There may be certain situations (such as responding to law enforcement requests - see Section 4 "*What purposes do we use your personal data for and what is our legal basis for processing?*" above) where a transfer of personal data will take place on the basis of exemptions provided for

under applicable data protection legislation. In these circumstances, we will take steps to minimise and protect the personal data transferred.

7. How do we keep your personal data safe?

The security of your personal data is very important to us, and we have implemented appropriate technical and organisational controls to protect your personal data against unauthorised processing and against accidental loss, damage or destruction. We have implemented data encryption in transit and at rest, data privacy and security training, information security policies and controls around the confidentiality, integrity and availability of our data/systems.
Any personal data collected in the course of providing Bolt services is transferred to and stored in our data centres which are located within the EEA. 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 and customer support services in the respective countries https://bolt.eu/cities/).
For our research and scientific purposes, all data, like bulk Geolocation Data, is anonymised so you can never be identified from it. Regarding anonymised data, we will not attempt to re-identify your personal data that has been deidentified, in the course of sharing your data with other organisations.
You are responsible though for choosing a secure password when we ask you to set up a password to access parts of our sites or apps. You should keep this password confidential and you should choose a password that you do not use on any other site.

8. How long do we retain your personal data for?

We keep your personal data only as long as necessary to provide you with the Bolt Services and for the purposes described above in Section 4 "*What purposes do we use your personal data for and what is our legal basis for processing?"*.
This means that the retention periods will vary according to the type, the amount and sensitivity of your personal data, the potential risk of harm from unauthorised use or disclosure of your personal data and the reason that we have collected the personal data in the first place.
Here are the key criteria we use for determining our retention periods:

Retention Periods Criteria	**Description**
Personal data retained until you remove/delete it	It's your right to request that we delete certain of your personal data. See Section 9 "What are your rights" for more information.
Personal data that expires after a specific	We have set certain retention periods so that

Retention Periods Criteria	Description
period of time	some data is not retained after a specific period of time. See table below for further details. After a retention period has lapsed, the personal data is securely deleted, unless it is necessary for the establishment, exercise or defence of legal claims.
Personal data retained until your Bolt account is deleted	We keep your data until your Bolt account is deleted unless further retention of certain personal data are required for the purposes described in the second table below.

We have listed below the specific retention periods that apply to the personal data we process about you:

Category of Retention Periods	Description
Accounting and financial reporting purposes	We retain data for 10 years after the last ride if your personal data is necessary for accounting purposes and for 3 years after the last ride regarding Payment Data in relation to micromobility rental services provided to Riders.
Provision of services purposes	We retain your data as long as you have an active rider account. If your account is closed, personal data will be deleted (according to our retention schedule and rules), unless such data is still required to meet any legal obligation, or for accounting, dispute resolution or fraud prevention purposes. You may request deletion of your account at any time through the Bolt App. See Section 9 "*What are your rights?*" below for more information.
Formal investigations of a criminal offence, fraud or false information	We retain data for as long as necessary according to the internal, legal, and regulatory requirements, in the event that there are formal investigations of a criminal offence, fraud or false information having been provided.
Disputes	We retain data in the event of disputes, until the claim is satisfied or the expiry date of such claims.
Instant Messages	We retain data about instant messages between you and the Customer Support Team directly in the Bolt App for 90 days, except in cases where messages are related to a reported incident or in the event, they are related to a dispute, in which cases we will store them for 6 months.
Sensors Data	We retain data on sensors for rental e-vehicles

Category of Retention Periods	Description
	for 6 months.
Customer Support	We retain data in relation to support tickets, complaints, phone calls and chats for 3 years.

Please note that the deinstallation of Bolt App in your device does not cause the deletion of your personal data.

9. What are your rights?

As a data subject you have following rights:

- **Access your personal data (known as "Right of Access"):** You have the right to access and to request copies of your personal data. You can request a copy of your personal data directly via the app. To find the access option, go to the menu and tap your name > Privacy > Your personal data. To see which data is available, visit our website. For personal data that is not accessible via the app, Contact our Customer Support Team.
- **Update/correct your personal data (known as "Right of Rectification")**: You have the right to request us to correct personal data that is inaccurate or incomplete. You can change and correct certain personal data yourself within the Bolt App or by contacting our Customer Support Team.
- **Delete your personal data (known as "Right of Erasure"):** 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). Personal data that is processed pursuant to a legal obligation or where we have an overriding legitimate interest may not be deleted upon request. You can request erasure of your personal data by contacting our Customer Support Team.
- **Restrict use of your personal data (known as "Right to Restrict Processing"):** 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 can request restriction of the use of your personal data by contacting our Customer Support Team.
- **Object to use of your personal data (known as "Right to Object"):** 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 interests). You may submit an objection to the use of your personal data by contacting our Customer Support Team.
- **Object to solely automated decisions being made about you which has legal or similarly significant effect on you (known as "Right to object to automated decision making")** - You have the right, under certain circumstances, to object to any solely automated decisions we have made which have a legal effect or similarly significant effect which does not involve human review. You can ask that a person review the decision, obtain an explanation of the decision reached after such assessment and challenge the decision by contacting our Customer Support Team. Please note that certain exceptions and limitations may apply to your right to object to automated decision-making, as permitted by applicable laws and regulations. We will provide you with clear information regarding the implications of exercising your rights and the processes involved in objecting to solely automated decision-making.

- **Port your personal data (known as "Right to Data Portability"):** You have the right to request that we transfer the personal data that you have given us to another organisation, or directly to you, under certain conditions. This only applies to information you have given us. You can request for your personal data to be ported by contacting our Customer Support Team.
- **Withdraw your consent**: If we process your personal data using consent as legal basis, then you have the right to withdraw your consent at any time (e.g., by unsubscribing from marketing communications or by updating your communication preferences in the Bolt App). Withdrawing your consent won't change the legality of processing undertaken by Bolt before you withdraw your consent.
- **File a complaint:** If you have any concerns regarding the processing of your personal data, you have the right to lodge a complaint with the Estonian Data Protection Inspectorate ("AKI") who is our lead supervisory authority or your local data protection authority. You can find their contact details on their websites. You may also have a right to seek a judicial remedy.

To exercise any of the above rights, you can contact our Customer Support Team via the Web Form or in the Bolt App when you go to the main menu and tap 'Support', the Customer Support Team will then forward the issue to Bolt's Data Protection Officer.

10. How do we use your personal data for direct marketing?

Please be aware that you may from time to time receive updates about special offers and promotions related to our services. We send these communications based on our legitimate interests (soft opt-in) in providing you with information about opportunities that could be beneficial to you. In countries where soft opt-in is not an available lawful basis for Bolt's processing activities, we will instead rely on an alternative valid legal basis. You have complete control over these communications, and if you decide at any time that you do not wish to receive them, you can stop them by clicking the "unsubscribe" link at the bottom of our emails, typing "STOP" for messages and SMS, or updating your communication preferences in your account settings.

Additionally, we may seek your opt-in consent for specific direct marketing activities where this is required by law. For example, we might request your consent to send you information regarding third-party promotions and offers that we think might be of interest to you. You always have the ability to opt out by changing your communication preferences in your account settings. We also personalise direct marketing messages using information about how you use the Bolt services (for example, how often you use the Bolt App).

11. How do we notify you of changes to this Notice?

We may make changes to this Notice from time to time. If we make significant changes, we will

notify you (as required) via the Bolt App, website or via another method such as email.