

Global Privacy Notice for Bolt Food Delivery Partners (Couriers)

At Bolt, we are focused on making cities for people. To do this, we offer a number of alternative transport solutions including ride-hailing, shared cars, e-scooters, e-bikes and food and grocery delivery. Your safety as a Delivery Partner 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 Food Platform and Bolt Courier App).

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1. About this Privacy Notice

This Privacy Notice (“Notice”) describes how Bolt Operations OÜ and its group companies (“Bolt Group”) (together “Bolt”, “We” or “Us”) and third party partners collect and use the personal data of persons delivering food and goods by using the Bolt Food Platform and Bolt Courier App - each known as a “Delivery Partner or Courier”. More information about Bolt Group companies, such as the relevant Bolt group company for your market, is set out [here](#).

The term “you” or “your” refers to a Delivery Partner. 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 have applied to or registered to the Bolt Food Platform via the Bolt Courier App, Courier or Fleet Portal or any other Bolt platform to provide a delivery service to Clients, whether acting on their own behalf as an independent delivery service provider or authorized by a delivery service provider to act on its behalf (for example, acting on behalf of a fleet or as a substitute delivery service provider).

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 data subject rights requests via Privacy Web Form available at <https://bolt.eu/en/privacy/data-subject/> or raise any privacy-related questions in the Bolt Courier App when you go to the main menu and tap 'Support'. Our Customer Support Team will then forward the issue internally to the Bolt Privacy Legal Team.

3. What personal data do we process?

We collect and process personal data:

- provided by you to Bolt;
- when you use the Bolt Food Platform, Bolt Courier App, and Courier or Fleet Portal; and
- from other sources such as Fleet Owners and Fleet Partners, 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:

Personal data provided by you to Bolt

Category of personal data	Description of personal data
Profile Data	We collect personal data about you when you register to and access the Bolt Food Platform and/or use the Bolt Courier App including: • Full Name • Email address • Login name and password • Phone number, including for Whatsapp use • Profile picture • Date of birth • Birth certificate (in countries where the delivery services are provided by minors) • City where you would like to provide delivery services • Place of residence • Gender (optional) • Bank details • Referral code • Documents such as a copy of a government-issued ID and a trade registry extract of the sole proprietor or an individual activity certificate • Delivery Bag information • Legal type and its details • Driver's license or a copy of the license to transport goods (in some countries where it's required by applicable laws) • Company reference - to indicate the Delivery Partner behalf of whom you provide delivery services, i.e. fleet (when applicable)

Category of personal data	Description of personal data
	• Confirmation of the employment with the Delivery Partner if applicable, i.e. fleet (in some countries where it's required by applicable laws) • Medical records (in some countries where it's required by applicable laws) as evidence of health or fitness to provide the Bolt services • Certificate of good conduct (in some countries where it's required by applicable laws) • Photo of National Transport and Safety Authority verification badge (in some countries where it's required by applicable laws) • Preferences and settings related to the account, such as language preferences, communication preferences and notification settings
Vehicle Data	In countries where it is required by applicable laws or in accordance with market practices and requirements, we may collect information about your vehicle (scooter, bike or car) and if you are using a car for the deliveries, the compliance status (roadworthiness supporting documents), including vehicle type/model, year and colour, license plates registration number, MOT, and vehicle Logbook (where applicable), car insurance details and status and relevant insurance proof after the sign up application.
Payment Data	In accordance with market practices and requirements we may collect payment details and banking data, including: • Payment methods and related payment verification information • Your bank details (account number and sort code) and IBAN details • Transaction details such as charges and disbursement amounts • Transaction history on the Bolt Food Platform • Taxpayer identification number • VAT ID (where applicable) • Financial account identifiers • Earnings reports (including delivery fee, small order fee, service fee). For billing purposes, we collect full name, postal address, date of birth, country of birth, tax identification numbers with issuing countries and TIN type (in countries where it's mandatory under DAC 7 requirements).
Identification / Verification Data	We collect identification documents as part of your sign up application. This may include: • Your driver's license, transport license and private hire license (where applicable) • Other government-issued or national identity documents (such as passports, IDs or birth certificates), which may include identification numbers as well as birth date, gender and photo • Photographs / pictures (such as a selfie) • Proof of your address (such as a recent bank statement)

Category of personal data	Description of personal data
	Any data gathered from external databases used for compliance checks (e.g., government databases for license status, insurance verification, regulatory requirements) that you submit yourself in order to start using the Bolt Food Platform and the Courier App
Demographic Data	We collect demographic data such as your age.
Survey / Interview Data	We collect the contents of your replies or attachments you may send us during the course of surveys and interviews that we conduct. During surveys and interviews, we collect data such as your feedback on your satisfaction with the Platform, your needs, and any issues you encounter while using the Platform.

Personal data we collect about you when you use the Bolt Courier App

Category of personal data	Description of personal data
Account Data	We generate and collect information used to identify your specific Bolt account on our systems, as well as: - Date of your account creation - Your account status (e.g., active / suspended) - Records of your account changes, including password reset requests
Geolocation Data	We collect data about your precise and/or approximate geolocation (including GPS, and IP address) from your mobile device depending on your device permissions, and your delivery routes (including the time, the journey progression and the final destination of a delivery), when you open your Courier App, regardless of your status, or run it in the background while marked as 'Go Online' in the Bolt Courier App.
Order Data	We collect personal data via the Bolt Courier App about your use of the Bolt Food Platform such as: - Order details (date and time, delivery addresses and geo coordinates, delivery estimate time, delivery distances and routes, restaurant or store name and location, order price and currency). - Order history, including all orders delivered, received, cancelled, and rejected, order numbers and order status.
App and Platform Usage Data	We collect personal data via the Bolt Courier App about your use of the Bolt Food Platform such as - Your engagement and interactions with the Bolt Courier App (features or pages viewed or proposed to be viewed, time spent interacting with a page, browser type, and other system activity). - Your state changes logs (when you change status to "Go Online" or "Go Offline"). - Irregular activity detected on your Bolt Courier App account due to fraud or in relation to delivery order cancellations, payment history. - Your login sessions and history to the Bolt Courier App.
Billing and Earning Data	We collect your billing data which consists of: invoices reports, cash on hand history, balance history

	(earning/debt balance history) and payouts (payments made by Bolt to you); • information on applicable pricing structures that you have selected within the parameters provided by the Bolt Courier App; • information on the prices applicable to specific orders taken via the Bolt Courier App (including applicable taxation and any prepaid amounts), as well as information on your earnings over certain periods of time (including your gross fare, balance, order fees, bonuses, and tips).
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; • Communicate via emails, web forms, or speak with our Customer Support agents; • Communicate with Clients via the Bolt Courier App using the in-app chat function or via internet calls (where available). 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. In the markets where we facilitate phone calls and text messages between Clients and Delivery Partners without sharing either party's actual phone number with the other, we protect your personal data by using a masked numbers application.
User Generated Data	We collect personal data when you use certain features in the Bolt Food Platform. This includes: • Content like pictures, videos, files in connection with a Customer Support request. • Metadata related to the method you use to communicate with Bolt.
Warning and Suspension Data	We collect details of suspensions or termination that have been issued to you as a Delivery Partner. This includes: • Date(s) on which warnings or suspensions have been issued and • Date of expiry of a warning or suspension • Reason(s) for the warnings or suspensions • Data on the violation of our Platform Terms and/or local laws • Data of safety incidents
Device Data	We collect data about the devices you use to access the Bolt Food Platform, including: • Hardware models • Device IP address and other unique device identifiers (such as your UUID) • Device operating systems • Browser version and Courier App version • Device vendor name • First and last date of use

	• Identity of mobile carrier and manufacturer
Cookies, SDKs, Analytics, and Third-Party Technologies Data	We collect information through the use of cookies (to the extent you use Bolt Food website services), tracking pixels, data analytics tools, SDKs, and other third-party technologies like advertising IDs to understand how you navigate through the Bolt Courier App, to make your experience safer, to improve your site and Bolt Courier 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

Category of personal data	Description of personal data
Contact Data	We collect personal data about you when a Delivery Partner refers you through our referral campaigns: • Name • Email address • Phone number • Place of residence
Background Check Data	In countries where it is required by applicable laws or in accordance with market practices and requirements, we may collect personal data about you after you submit your sign up application in order to check you meet the relevant local conditions to use the Bolt services, including: • Data about criminal convictions and offences, where required under local laws and regulations • License status • Right to work This information may also be collected by an authorised third party vendor on our behalf.
Identification/Verification Data	According to market practices and requirements, we collect data from third party identity verification providers in order to verify your documents and your identity, such as ID number, first and last name, gender, address, citizenship, date of birth, place of birth, nationality, and data related to documents such as document type, issue, number, country of issue, issue and expiry dates.
Compliance Data	In countries where it is required by the applicable law or in accordance with the market practices and requirements, we may collect personal data from service providers that conduct compliance checks including registrations, certifications and other documentation that are required in the applicable jurisdiction, and also screenshots of public databases supporting that we conducted a compliance check, after you submit your sign up application in order to verify any information you supplied to Bolt during registration.
Ratings, Acceptance Rate and Client's feedback	We collect personal data about you, including feedback, and ratings from the Clients, regarding the quality of the delivery services you have provided, collected after each delivery. The ratings are displayed with just thumbs up and thumbs down, when the delivery is completed. We also collect your Acceptance Rate, which is calculated as the ratio of

	accepted orders to the total number of proposed orders
Fleet Data	In some countries, we collect your Profile Data, Vehicle Data, Payment Data, Identification/Verification Data, Background Check Data, and Demographic data from fleet owners.

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 "*What personal data do we process?*" 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 the Terms and Conditions for Delivery Partners. 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 Delivery Partners, and other third parties (including Clients). 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.

For the provision of the Bolt services

Purpose of processing	Legal Basis	Categories of Personal Data
To create, update and maintain your Bolt account	• <i>Performance of a Contract</i>	• Account Data • Profile Data • Fleet Data • Device Data
To authenticate your account and verify your identity We collect information to verify who you say you are either upon registration or as a result of unusual activity being detected on your Bolt account. If we ask you to verify your identity and you are not able to verify, the Bolt Food Platform and the Courier App will be suspended to prevent fraud until the verification process is completed. As part of the verification process, you may be asked to submit a selfie and/or ID document to prove your identity. To verify your identity quickly and securely, we use facial recognition technology to confirm that your selfie shows a clear face and matches the face on your identity document. This involves processing your facial measurements. Your biometric data may be shared with trusted verification providers to confirm your identity. If you prefer not to use facial recognition technology, you can opt for your identity to be manually verified by a member of our team, though this may take longer. You can withdraw consent at any time by contacting our Customer Support. We retain your selfie and identity document as long as you have an active user account.	• <i>Performance of a Contract</i> • <i>Compliance with Legal Obligations</i> • <i>Legitimate Interests</i> - It is in our interest and in the interest of our Delivery Partners to prevent and address unauthorised uses of Bolt accounts and violations of our Terms and Conditions for Delivery Partners • <i>Consent</i> - Your opt-in consent will be required in order for us to proceed with biometric verification checks.	• Account Data • Profile Data • Identification / Verification Data • Background Check Data • Device Data • Geolocation Data • App and Platform Usage Data

Purpose of processing	Legal Basis	Categories of Personal Data
We may use automated processes to authenticate your account or verify your identity. Bolt will inform you about this and provide you with the right to request a human review of the results. Please see Section 9 “What are your rights?” below.		
To enable, improve and customise the services for the purposes of delivering orders by connecting Clients and restaurants with Delivery Partners We use Geolocation Data to facilitate deliveries, calculate estimated time, and track the progress of your orders and deliveries. We use Acceptance Rate and Geolocation Data to match available Delivery Partners with restaurants and stores and Clients to enable efficient delivery. Communication Data is processed if the Delivery Partners and Clients need to contact each other to coordinate order and delivery.	• <i>Performance of a Contract</i> • <i>Legitimate Interests</i> - It is in our legitimate interests and in the interests of our Clients and Delivery Partners to facilitate the most convenient communication with each other.	• Account Data • Profile Data • Geolocation Data • Order Data • Acceptance Rate • Device Data • Communication Data
To make sure that your delivery is the quickest and goes smoothly We collect Geolocation Data and data on the routes taken during the journey to analyse geographic coverage. This lets us improve recommendations to Delivery Partners about the most efficient routes and facilitate the delivery in the best possible way. We also collect App and Platform Usage Data to resolve quality issues related to your use of the	• <i>Performance of a Contract</i> • <i>Legitimate Interests</i> - It is in our legitimate interests and in the interests of our Delivery Partners to facilitate the most convenient delivery.	• Geolocation Data • App and Platform Usage Data • Order data • Account Data • Profile data

Purpose of processing	Legal Basis	Categories of Personal Data
Bolt Courier App. In some countries, we also check the source of your geolocation to identify the mocked location. The source of geolocation is sent by your device without your real or mocked geolocation information. In order to waive low-emission zone fees, in some countries, we may share your phone number and order timestamp (from / to low emission zone) with municipalities that collect fees for entry into low-emission zones.		
To make sure the Bolt Courier App works optimally We use your Account Data and Profile Data to notify you of updates to the Bolt Courier App so you can keep using the Bolt services. We also use Device Data and App and Platform Usage Data to ensure you can connect to the Bolt Courier App and to help keep your account safe through authentication and verification checks.	• <i>Performance of a Contract</i> • <i>Legitimate Interests</i> • <i>Consent</i> - Your opt-in consent is required for the use of Cookies, SDKs, Analytics, and Third-Party Technologies Data.	• Account Data • Profile Data • Device data • App and Platform 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 facilitate payment on behalf of Delivery Partners, and Geolocation Data and Order Data to calculate prices based on the distance traveled, duration and other factors.	• <i>Performance of a Contract</i>	• Payment Data • Geolocation Data • Order Data
To get your feedback on your level of satisfaction with Bolt services through surveys and interviews These surveys and interviews are designed to understand your feedback on our services, to measure customer satisfaction	• <i>Consent</i> - Your opt-in consent will be required. • <i>Legitimate Interests</i> - It is in our interest and in the interest of our Delivery Partners to provide a satisfying delivery experience.	• Account Data • Profile Data • Demographic Data • Survey/Interview Data

Purpose of processing	Legal Basis	Categories of Personal Data
and enable us to take actions to improve the experience. The Survey and Interview Data may be shared with research partners we use to understand your feedback.		

For Customer Support

Purpose of processing	Legal Basis	Categories of Personal Data
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 (including resolving disputes between Clients and Delivery Persons). We also use the data you share to address quality issues and to improve our services. For safety related incidents, your Warning and Suspension Data will only be reviewed by Bolt's Customer Support and/or Safety Teams when investigating a safety/criminal incident on the Bolt Food Platform involving you. The teams will also review the circumstances surrounding potential safety incidents. We may use automated processes for complaint resolution purposes via our automated chat function. Bolt ensures that you have the right to contact a human agent for complaint resolution. For further information regarding how to object to the above activities, please see Section 9 "<i>What are your rights?</i>" below.	• <i>Performance of a Contract</i> • <i>Legitimate Interests</i> - It is in our interest and in the interest of our Delivery Persons to support them throughout their use of the Bolt Courier App and continuously improve and develop the customer support we provide. In addition it is in our interest and interest of our Delivery Partners and Clients to address threats and abuse and promote safety, integrity and security on the Bolt Food Platform to ensure our services are used in accordance with the Terms and Conditions for Delivery Partners • <i>Compliance with Legal Obligations</i> - We process personal data to comply with our legal obligation to cooperate with law enforcement when there is a safety incident.	• Account Data • Profile Data • Communication Data • Billing and Earning Data • Order Data • User Generated Data • Ratings, Acceptance Rate and Client's feedback • Warning and Suspension Data

For safety and security

Purpose of processing	Legal Basis	Categories of Personal
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		Data
To prevent, detect and investigate fraudulent accounts, fraudulent payments or other unlawful use of Bolt services and apply suspensions and blocks as needed To ensure safety of the Bolt Food Platform for all users, we will ask you to verify your identity. If we will not be able to verify your identity, the Bolt service will be suspended until the verification process is completed. Identification/Verification Data will be used to verify your identity upon registration and sometimes during activity on the Platform, for safety and security purposes and fraud prevention. We may use facial recognition technology to prevent fraudulent use of Bolt accounts by those other than the account owner and to prevent users from creating multiple accounts. For this, we may ask you to take a selfie in order to confirm that the selfie matches the photos and documents that have been submitted. In addition, background check data will be reviewed to verify your identity, in case there is evidence of fraud. In cases of fraud, our automated anti-fraud system will mark those fraudulent accounts and any other suspicious or unlawful activities the Delivery Partner will be blocked. If false or inaccurate information is provided and fraud or any type of abuse is identified or suspected, your personal data may be passed to fraud	• <i>Legitimate Interests</i> - It is in our interest and in the interests of our Delivery Partners to detect, prevent and address fraud, unauthorised use of Bolt accounts or other harmful or illegal activity and secure the safety, security and integrity of our systems, by responding to suspected or actual criminal acts. It is also in our interest and in the interests of our Delivery Persons to prevent and address violations of our Terms and Conditions.	• Account Data • Profile Data • Identification / Verification Data • Order Data • Device Data • Geolocation Data • Billing and Earning Data • App and Platform Usage Data • Communication Data

prevention agencies and may be recorded by us or by them. While Bolt may use automated processes for fraud detection, decisions are only taken following human review by our staff, and no account is ever blocked automatically. For information regarding how to object to the above activities, please see Section 9 “What are your rights” and contact the Customer Service.		
To verify that you and your vehicle meet the safety requirements We may use automated processes to verify that you and your vehicle meet the safety requirements. Bolt will inform you about this and provide you with the right to request a human review of the results. Please see Section 9 “<i>What are your rights?</i>” below.	• <i>Legitimate Interests</i>--It is in our interest and in the interest of our Delivery Partners to provide a quality, reliable, safe and secure service to everyone and encourage and ensure a safe use of the Bolt Platform and compliance with our Terms and Conditions for Delivery Partners.	• Account Data • Profile Data • Vehicle Data • Compliance Data

For Marketplace efficiency and compliance with our Terms and Conditions for Delivery Partners

Purpose of processing	Legal Basis	Categories of Personal Data
To warn and suspend Delivery Partners who do not comply with our Terms and Conditions In order to provide a safe and reliable marketplace, we may monitor Delivery Partners’ compliance with our Terms and Conditions to ensure that Delivery Partners: • do not unnecessarily create safety risks for the Clients of the Bolt Food Platform; • do not unnecessarily interfere with the arrangement of services via the Bolt Food	• <i>Legitimate Interests</i>--It is in our interest to provide a quality, reliable and enjoyable service to everyone and encourage and ensure a safe use of the Bolt platform and compliance with our Terms and Conditions for Delivery Partners • <i>Performance of Contract</i>	• Account Data • Profile Data • App and Platform Usage Data • Communication Data • Ratings, Acceptance Rate and Client’s feedback • Warning and Suspension Data

Platform; and/or • act in a manner that is materially inconsistent with a genuine intention to provide services via the Bolt Food Platform. • do not act in a manner that causes any abuse or harm to the Bolt Food Platform, • do not fail to comply with his/her obligations under the General Terms. If, after a pertinent notification from us, you continue to violate the Terms and Conditions for Delivery Partners, your Delivery Partner's account will be suspended or terminated. While Bolt may use automated processes for issuing suspensions, decisions about termination in the EU are only taken following human review by our staff, and no account is ever blocked automatically. For information regarding how to object to the above activities, please see Section 9 "What are your rights."		
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For marketing and advertising

Purpose of processing	Legal Basis	Categories of Personal Data
To market and advertise Bolt services and those of partners according to your preferences and measure the effectiveness of 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	• <i>Legitimate Interests</i> - It is in our interest and in the interest of our Delivery Partners to inform them about our 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	• Contact Data • App and Platform Usage Data • Order Data • Device Data • Cookies, SDKs, Analytics, and Third-Party Technologies Data

and events of Bolt and our partners. We may 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.	performance, in order to expand our user base by deepening relationships with existing Delivery Partners 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. • <i>Consent</i> - Your opt-in consent will be required for example, when the law requires consent for email marketing and for certain tracking technologies. 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.	
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For service communications

Purpose of processing	Legal Basis	Categories of Personal Data
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 and send you for example emails, text messages (including WhatsApp messages) push notifications, and in-app messages, updates and reports, including about your use of the Bolt Food Platform and experience.	• <i>Performance of a Contract</i>	• Account Data • Profile Data • Contact Data

For research and improvement of the Bolt Food Platform

Purpose of processing	Legal Basis	Categories of Personal
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		Data
To perform research, testing, and analytics to better understand and improve our business and services For example, we use Geolocation Data, Order Data, Communication Data and App and Platform Usage Data to conduct research to develop or improve our products, services, technology, algorithms, machine learning, and other modelling. We use Communication Data to monitor our security practices and improve our operations and processes.	• <i>Legitimate Interests</i> - 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 services we provide. • <i>Consent</i> - 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 • Order Data • App and Platform Usage Data • Communication Data • User Generated Content • Device Data
To develop new products, features, partnerships and services	• <i>Legitimate Interests</i> - It is in our interest and in the interest of our Delivery Partners to develop and adopt new features to improve the Bolt Food Platform.	• Account Data • Profile Data • Geolocation Data • Order Data • App and Platform Usage Data • Communication Data • User Generated Content • Device Data
To prevent, find, and resolve software or hardware bugs and issues	• <i>Legitimate Interests</i> - It is in our interest and in the interest of our Delivery Partners to provide a hassle free and reliable service.	• Account Data • Profile Data • Geolocation Data • User Generated Content • Communication Data • Device Data • App and Platform Usage Data

For legal proceedings and compliance with the law

Purpose of processing	Legal Basis	Categories of Personal Data
To investigate and respond to claims and disputes relating to the use of Bolt services, and/or necessary for	• <i>Compliance with Legal Obligations</i> - We process personal data to comply with an obligation, when	• All Data

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; • the assignment 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. We also respond to requests, such as those from law enforcement agencies, when the response is required by law or furthers a public 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.	there is a request from a regulator, law enforcement or other governmental body. • <i>Legitimate Interests</i> - In the context of litigation or other disputes, it is in our interest to protect our interests and rights, our Delivery Partners or others, including as part of investigations, regulatory inquiries or litigation.	
To fulfill our tax obligations and comply with tax legislation	• <i>Compliance with a Legal Obligation</i>	• Account Data • Profile Data • Payment Data • Billing and Earning Data Data • Order Data
To reorganise or make changes to our business	• <i>Legitimate Interests</i> - It is in our interest to process personal data for organisational and	• All Data

	business planning purposes.	
To ensure the security of the Bolt services (including the Bolt Food Platform and Bolt Courier 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 Food Platform and Courier App as well as for making and storing back-up copies and preventing/repairing technical issues.	• <i>Legitimate Interests</i> - It is in our interest and in the interest of our Delivery Persons 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 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.
Our Clients	Your personal data is disclosed to our Clients when you engage with a delivery in the Bolt Courier App. In such a case, the Clients will see your first name and the letter of the last name, your phone number (to the extent the Client or you use the app function that enables calls in countries where Bolt does not have phone masking feature), and location during the order delivery (from the moment the order is assigned to you until the order is finished in the Courier App by you).
Restaurants and stores	Your personal data is disclosed to our Partners such as

Category of Recipients	Description
	restaurants and stores when you engage with a delivery in the Bolt Courier App. In such a case, the Partners will see your first name and the letter of the last name and your phone number when the order is assigned to you via the Bolt Courier App. After fulfilling the order, your first name and the letter of the last name and the telephone number will remain visible to the Partner for 24 hours. This is necessary to resolve any issues with you.
Bolt Business Clients or other Bolt account owners	Some deliveries you accept may be requested or paid for by others than the Clients like Bolt Business Clients or other Bolt account owners. In this case we may share with that other party some of your data like your name, order details and tax identification number, sole proprietor or individual activity certificate number (as a part of the invoices information). This information will be disclosed to our Business Clients via reports they can access on their Business Accounts.
Fleets	Depending on your location, your personal data may be disclosed to third-party delivery service providers like Fleet Owners. Via the Fleet Owner Portal, they will have access to your delivery history, your name, mobile phone number, email and they will view your, including activity metrics and finished deliveries metrics, your earning reports and payouts, your receipts and/or invoices and the blocks/suspensions imposed on you.
Referrers	If you refer someone to the Bolt CourierApp, we will let them know that you generated the referral. If another user referred you, we may share information about your use of the Bolt Platform with that user. For example, a referral source may receive a bonus when you join the Bolt Courier App or complete a certain number of orders and would receive such information.
Insurers	We may 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 may also share data with insurers, for the purposes of claims management and settlement to avert further damage to us.
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

Category of Recipients	Description
	Facebook 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, 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 with Google in connection with the use of Google maps in our apps.
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. We may share your personal data with municipalities and public bodies collecting fees for low-emission zones entry in order to waive fees during an active order.
Law Enforcement	We may disclose information under a court order or where we cooperate with a data protection supervisory authority in handling 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 our 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 “ <i>What are your rights?</i> ” below for more information.
Personal data that expires after a specific period of time	We have set certain retention periods so that 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
Tax, accounting and financial reporting purposes	We retain data for 10 years after the last order if your personal data is necessary for tax, accounting and financial reporting purposes.
Provision of services purposes	We retain your data as long as you have an active Bolt Courier account. If your account is deleted, 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 “ <i>What are your rights?</i> ” below for more information.
Formal investigations of a criminal offence,	We retain data for as long as necessary according to the internal, legal, and regulatory requirements, in the event that there are formal

Category of Retention Periods	Description
fraud or false information	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.
Complaints	We retain a record of all complaints which we make available to an authorised officer of the licensing authority on request in the case of an investigation for 12 months.
Instant Messages	We retain data about instant messages between you and the Customer Support Team directly in the Bolt Courier App for 60 days from the last communication and in Bolt's databases for 3 years from the last communication. Instant messages between Delivery Partners and Clients are kept in the Bolt Courier App only until the order is completed and for 30 days after in our systems.
Customer Support	We retain data in relation to support tickets, phone calls, and chats for 3 years.
Geolocation Data	We retain your Geolocation Data for 2 years from the time it is collected.

Please note that the deinstallation of Bolt App in your device does not cause the deletion of your personal data. If the Bolt App has not been used for three years, we'll get in touch and ask you to confirm whether you wish to keep your account active for future use. If no reply is received in a reasonable time, the account will be closed and personal data will be deleted unless such data is required for any purpose mentioned earlier in this Notice.

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 by contacting 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 Courier 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 Bolt App or via our website. You can also contact the Office of the Data Protection Officer Team 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 [contact our Customer Support Team](#) via the Privacy Web Form available at <https://bolt.eu/en/privacy/data-subject/> or in the Bolt Courier App when you go to the main menu and tap ‘Support’. Our Customer Support Team will then escalate the issue internally to the Bolt Privacy Legal Team.

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 Courier 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 Courier App, website or via another method such as email.