Global Privacy Notice for Passengers

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

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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 arranging passenger rides services via the Bolt App - each known as a "Passenger". More information about Bolt and its group companies, such as the relevant Bolt group company for your market, is set out here.

The term "you" or "your" refers to a Passenger. 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 a ride 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.

Please note that our personal data processing activities may be subject to differing applicable laws and regulations in the places in which we operate. This means that we engage in the personal data processing activities described in this Notice in a particular country only if permitted under the laws of that country. For further information about the jurisdictional disclosures and differences that may apply to you, please refer to Section 11 '*Jurisdictional Disclosures*' below.

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 the Bolt App when you go to the main menu and tap 'Support', the Customer Support Team will then escalate the issue internally to Bolt's 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 App; 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:

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 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 (optional) ● Saved favourite locations (optional) ● Date of birth (optional) ● Preferences and settings related to the account, such as language preferences, communication preferences and notification settings
Payment Data	We collect details of your payment methods including payment card type, bank name, bank account number, bank account sort code, related payment verification information and transaction history on the Bolt Platform.
Identification / Verification Data	We collect identification documents including government-issued or national identity documents (such as passports, driver's licences or national ID cards) 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 the content of your replies or attachments you may send us, during the course of surveys and interviews that we conduct.

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

Category of personal data	Description of personal data
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. You may use the Bolt App without enabling collection of Geolocation Data from your mobile device. This may affect some features on the Bolt 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 services. This includes: details of journeys (date and time, pick -up and drop-off addresses, journey distances and routes), 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.
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, or communicate with Drivers via the Bolt 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 Drivers and Passengers 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. For example to provide recordings such as audio recordings generated during the trip (as part of our safety toolkit trip audio recording feature, where such feature is available - for more information, please visit https://bolt.eu/en-ee/driver/safety/), or to submit content like pictures, videos, files in connection with a Customer Support request or ratings or feedback about other users, including compliments that you have the option to give to Drivers, when you finish your ride, along with a 5 star review. This also includes metadata relating to the method you use to communicate with Bolt.
Warning and Suspension Data	We collect details of warnings and suspensions that have been issued to a Passenger. 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.
Calendar Data	If you set your device permissions or choose to give Bolt access to your chosen calendar, we will collect information available in your calendar such as event details to use in providing you certain optional features. For example, to remind you of scheduled rides and get alerts

	to order a ride for your upcoming trip.
Cookies, SDKs, Analytics, and Third-Party Technologies Data	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

Category of personal data	Description of personal data
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 Passenger refers you through our referral campaigns or orders you a ride, or if you use the Bolt App through your employer's Bolt Business account. This includes your: ● Full name ● Email address ● Phone number
Rider Rating Data	We collect ratings and feedback via comments about you from Drivers after each trip. Drivers are required to rate a Passenger from 1 to 5 stars, based on their trip experience and where a Driver assigns a low score to a Passenger (1-3 Stars), the Driver will be required to provide mandatory feedback for that Passenger. Your average Rider Rating is available to you in the Bolt App. You can learn more about how ratings are calculated here. The rating will be linked to your account and only your average Rider Rating will be visible to Drivers in the Bolt App when they accept a journey. If we find out the rating or comment is not given in good faith, this rating or comment may not be included in the calculation of your rating.

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. Please remember that depending on your country of residence, certain jurisdictional disclosures and differences may apply to your personal data that is processed by Bolt as set out in the table below (please see Section 11 '*Jurisdictional Disclosures*' for more information):

- **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 Passengers. 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 Passengers, and other third parties (including Drivers). 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.
- **Vital Interests**: When we process your personal data where it is necessary to protect your vital interests or those of others, for example in the event of an emergency or an imminent threat to life.

For the provision of the Bolt services

Purpose of processing	**Legal Basis**	**Categories of Personal Data**
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 in certain circumstances to verify your age and eligibility for a Bolt account, when required by local law. If we ask you to verify your identity (either upon registration or as a result of unusual activity being detected on your Bolt	• *Performance of a Contract* • *Compliance with Legal Obligations* • *Legitimate Interests* - It is in our interest and in the interest of our Drivers to prevent and address unauthorised uses of Bolt accounts and violations of our Terms and Conditions which increases Drivers' safety. • *Consent* - Your opt-in consent will be required in order for us to proceed	• Profile Data • Identification / Verification Data • Device Data • Geolocation Data • App Usage Data

Purpose of processing	Legal Basis	Categories of Personal Data
account) and you are not able to verify, the Bolt services 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.	with biometric verification checks.	
To enable, improve and customise the transportation services and other services/features by connecting Passengers with Drivers We help get you to where you want to go. We use Geolocation Data to navigate Passenger pick-ups and drop-offs, calculate estimated time, and track the progress of rides. We match available Drivers with Passengers based on their Geolocation Data to enable efficient pick-up and drop-off, and make the journey and route transparent. Refusing to share Geolocation Data via the Bolt App prevents us from fulfilling the contract with you and means we cannot direct a Driver to your location for pick-up. The Passenger's Profile Data is displayed to the Driver as part of the matching process so that they know how to locate the Passenger at their pick-up destination.	• *Performance of a Contract* • *Consent* - we will require your consent when you use certain features of the Bolt App. For example, if you choose to upload a profile photo on the Bolt App (viewable to Driver's during pick-up).	• Profile Data • Geolocation Data • App Usage Data • Device Data • Communication Data

Purpose of processing	Legal Basis	Categories of Personal Data
Communication Data may be processed if the Driver and Passenger need to contact each other to coordinate the pick-up.		
To make sure that your journey goes smoothly We use Geolocation Data to make sure you get to your destination and data on the routes taken during the journey to analyse geographic coverage. This lets us improve recommendations to Drivers about the most efficient routes and facilitate your journey in the best possible way. We also collect App Usage Data to resolve quality issues related to your use of the Bolt App.	• *Legitimate Interests* - It is in our legitimate interests and in the interests of our Passengers to offer you the most convenient journey.	• Geolocation Data • App Usage Data
To make sure the Bolt App works optimally We use your Profile Data 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 suggest new rides and destinations and to schedule rides based on your upcoming events We use your previous journey history, your saved favourite locations (such as home or work	• *Consent* - Your opt-in consent is required to use real time Geolocation Data and to allow access to your calendar. • *Legitimate Interests* - It is in our legitimate interests and in the interests of our	• Profile Data • App Usage Data • Geolocation Data • Calendar Data

Purpose of processing	Legal Basis	Categories of Personal Data
addresses) and real time Geolocation Data (even when the Bolt App is closed provided you have consented to 'enable location services in the background') to provide suggestions on new rides. You can always disable these specific notifications, without disabling all Bolt notifications. In addition, after you schedule a ride on Bolt, we will provide an integration with your phone's native calendar app, allowing you to add your scheduled ride to your calendar of choice seamlessly. The Bolt App will be able to detect and extract calendar events from your native calendar app and this includes retrieving event titles, start and end times, and location details. Based on your calendar events, the Bolt App will provide you with suggestions for rides that align with your calendar schedule.	Passengers to further enrich your journey experience and suggest new features and services.	
To calculate prices and process payments We collect Payment Data to process and enable Passenger payment on behalf of Drivers and Geolocation Data to calculate prices based on the pickup and drop-off location of the Passengers taking into account distance, duration and other factors.	● *Performance of a Contract*	● Payment Data ● Geolocation Data

Purpose of processing	Legal Basis	Categories of Personal Data
To administer the use of and payment for the Bolt services you are offered by a Bolt Business Client or another Bolt account owner We collect your Contact Data if you use our services through your employer who is a Bolt Business Client. In addition, if an organisation or another Bolt account owner has ordered a ride for you using our Ride Booking service, we will collect from them your Contact Data and the pickup and drop-off location of your ride.	● *Legitimate Interests* - It is in our interest and in the interest of our Business Clients, Customers and Passengers to facilitate the use of our services through Bolt Business accounts and other Bolt 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 Bolt services through surveys and interviews These surveys and interviews are designed to understand your feedback on our services, to measure customer satisfaction and perception of safety 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.	● *Consent* - Your opt-in consent will be required. ● *Legitimate Interests* - It is in our interest and in the interest of our Passengers to provide a satisfying passenger experience.	● Profile Data ● Demographic Data ● Survey/Interview Data

For Customer Support

Purpose of processing	Legal Basis	Categories of Personal Data
To provide customer	● *Performance of a Contract*	● Profile Data

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 Drivers and Passengers). 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 Platform involving you. The teams will also review Drivers' reasons for issuing low-ratings to Passengers, and the circumstances surrounding potential safety incidents. 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.	● *Legitimate Interests* - It is in our interest and in the interest of our Passengers to support them throughout their use of the Bolt App and continuously improve and develop the customer support we provide. In addition it is in our interest and interest of our Passengers and Drivers 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 Terms and Conditions for Passengers. ● *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 ● Rider Rating Data

For safety and security

Purpose of processing	**Legal Basis**	**Categories of Personal Data**
To enable and provide safety features We use data to ensure Bolt	● *Legitimate Interests* - It is in our interest and in the interests of our Passengers	● Identification / Verification Data ● Device Data

services are secure and have implemented a variety of safety features to enhance the safety of our Passengers, including: ● *Audio Trip Recording* - enabling Passengers and Drivers to record audio if they feel unsafe during a trip and submit it to Bolt when reporting a safety incident. These recordings are encrypted and can only be listened to by Bolt, if submitted by a Passenger or Driver; ● *Rider Emergency Assist* - enabling you to call the Police, the local authorities or emergency services via our Rider Emergency Assist feature. If you use this feature, Bolt's Customer Support Team will follow up with you to check if you need any assistance; ● *Trip Safety Monitoring*- enabling Bolt to send Passengers and Drivers notifications and check if you are okay or need assistance from Bolt Customer Support or the Local Authority; ● *Trip Sharing* enabling you to	to enhance the safety and security of the Bolt services by offering safety functionalities as part of Bolt's Safety Toolkit. It is also in the interests of our Passengers or Drivers to use the Audio Trip Recording feature for their own (or others) safety and to provide evidence of a safety or security incident. ● *Vital Interests* - We process this personal data where your vital interests require protection, such as in the case of emergencies and safety incidents, when using safety features like Rider Emergency Assist or Trip Safety Monitoring.	● Geolocation Data ● Profile Data ● App Usage Data ● User Generated Data ● Communication Data

share a link with real-time journey information (email, SMS, WhatsApp, Telegram), so friends and family can follow your ride status and live location; and ● *Women for Women Category* - enabling women Passengers to select a preference to only be matched with women Drivers.		
To prevent, detect and investigate fraudulent accounts, fraudulent payments or other unlawful use of Bolt services 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. To enable us to investigate, a temporary suspension may be applied to a Bolt account when for example we detect that the Passenger 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,	● *Legitimate Interests* - It is in our interest and in the interests of our Passengers 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 interest and in the interests of our Passengers to prevent and address violations of our Terms and Conditions.	● Profile Data ● Identification / Verification Data ● Device Data ● Geolocation Data ● App Usage Data ● Payment Data ● Communication Data

decisions to block a Passenger 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.		
To determine an average Rider Rating and encourage positive, safe and respectful interactions between Passengers and Drivers on the Bolt Platform, and unmatch Passengers and Drivers In order to provide additional reassurance to Drivers and to provide a safe and accountable marketplace environment, Drivers provide you with a rating and leave feedback regarding their experience with you after each ride. The Rider Ratings feature empowers Drivers to make informed decisions about accepting or declining ride requests and exercise greater control over their working environment, as they can assess the average Rider Rating of a Passenger based on ratings provided by other Drivers before they accept a ride. For further information about your Rider Rating, the behavioural guidelines to follow and guidance how	● *Legitimate Interests* - It is in our interest and in the interest of our Passengers and Drivers to enhance quality, safety and trust within the Bolt Platform. To encourage positive and respectful interactions between Passengers and Drivers on the platform and provide a safe, hassle-free and pleasant environment and experience. It is also in our interest to ensure and to enforce our services are used in accordance with the Terms and Conditions for Passengers and the Marketplace Conduct Guidelines.	● Rider Rating Data ● Profile Data

to improve your rating, please read these FAQs: https://bolt.eu/en/rider-rating/ and https://bolt.eu/en/blog/new-bolt-app-features/. In addition, both the Passenger and the Driver have the option to unmatch from each other if either party rates the other with a 1-star rating after a journey. To initiate this, the party giving the 1-star rating can select the 'Block Future Requests' button. Once this option is chosen, the Passenger and Driver won't be matched again for future journeys. Despite this, the Passenger retains the ability to request rides with other Drivers. The unmatching will be in place until either the Passenger's or the Driver's account is deleted.		
To issue warnings and temporary suspensions when the average Rider Rating drops below a specified threshold (where this feature is available) To balance the interests of Passengers and Drivers, if the average Rider Rating drops below a certain threshold (which differs per country), an automatic warning will be issued. If the average Rider Rating is not improved within 90 days following a warning, a 6-month temporary suspension will be issued. This will be based on an	• *Legitimate Interests (for warnings)* - It is in our interest and in the interest of Drivers for Bolt to automatically send a warning notice to ensure a reliable and trustworthy service and Platform sustainability, along with Drivers empowerment. It is also in our interest to ensure and to enforce our services are used in accordance with the Terms and Conditions for Passengers and the Marketplace Conduct Guidelines. • *Performance of a Contract (for suspensions)*	• Profile Data • Rider Rating Data • Warning and Suspension Data • User Generated Data

automated decision but does not produce legal or similarly significant effects. For information regarding how to object to this activity, please see Section 9 "*What are your rights?*" below. You will get temporality suspended only if you appear (based on your average Rider Rating) to repeatedly: ● violate the Terms and Conditions for Passengers and Marketplace Conduct Guidelines for Riders; and ● have a negative impact on Drivers' interests and the integrity of the Bolt Platform as a whole. The suspension only limits your ability to order a ride, and does not limit your access to the rest of the Bolt App, or to any other of our services.		

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 Bolt's ads This includes using your personal data to send emails, text messages (including WhatsApp messages), push	● *Legitimate Interests* - It is in our interest and in the interest of our Passengers 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	● Contact Data ● AppUsage Data ● Device Data ● Cookies, SDKs, Analytics, and Third-Party Technologies Data

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.	advertising, analytics, and measurement of ad performance, in order to expand our user base by deepening relationships with existing Passengers 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.	

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 with you to let you know that your journey has been completed, to send you trip confirmation emails and	● *Performance of a Contract*	● Profile Data

receipts, and to let you know about important service updates.		

For research and improvement of the Bolt services

Purpose of processing	Legal Basis	Categories of Personal Data
To perform research, testing, and analytics to better understand and improve our business and 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 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 Passengers 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 Passengers to provide a hassle free and reliable service.	• Profile Data • Geolocation Data • User Generated Content • Communication Data • Device Data • App 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	• *Compliance with Legal Obligations* - We process	• All Data

disputes relating to the use of Bolt services, 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; ● 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.	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 Passengers or others, including as part of investigations, regulatory inquiries or litigation.	

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 Passengers 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.
Drivers	Your personal data is only disclosed to the Drivers (whether acting on their own behalf as an independent service provider, or acting on behalf of another service provider (for example, acting on behalf of a fleet or another individual)) when you engage with a ride in the Bolt App; in such a case, the Driver

Category of Recipients	Description
	will see your name, phone number (in many countries the number is masked), pickup, destination and geolocation data. Once the ride is finished, we also share ratings and feedback with the Driver. (We remove your identity associated with ratings and feedback when we share it with Drivers). After providing the transportation service, your name and the telephone number will remain visible to the Driver for 24-48 hours. This is necessary for Drivers to resolve any issues with you like getting something special back to you which might have been left in the car. Depending on your location, and if our audio recording safety feature is available, we may also share an audio recording initiated by a Driver with the Driver or law enforcement authorities.
Bolt Business Clients or other Passengers	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, rating given, region of trip, 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 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

Category of Recipients	Description
	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 journey 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.
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 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. Please see Section 11 "*Jurisdictional Disclosures*" for details of any exceptions that apply in your country to the transfer of your personal data.

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 "*What are your rights?*" 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 journey 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 passenger 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.
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 App for 90 days, except in cases where messages are related to a reported incident or in the event, they

Category of Retention Periods	Description
	are related to a dispute, in which cases we will store them for 6 months. Instant messages between Passengers and Drivers are kept in the Bolt App only until the order is completed and for 3 months after in our systems.
Audio Trip Recording	We retain Audio Recording Data through our Audio Trip Recording Feature: 24 hours, while stored locally on the device of the person who generates the recording. The recordings are automatically deleted after 24 hours if a report to Bolt's Customer Support team is not created and the recording is not explicitly shared with Bolt's Customer Support team as part of the report. Recordings shared and investigated by Bolt will be automatically deleted after 7 days unless the retention period is manually extended for investigation/legal reasons.
Customer Support	We retain data in relation to support tickets, phone calls and chats for 3 years.
Rider Ratings	We retain Rider Rating Data for: ● 3 years for specific ratings and comments ● for the duration of Passenger or Driver account for the unmatching status

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 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*".

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. Jurisdictional Disclosures

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

Country	Disclosures	Alternative Legal Bases
The Republic of Azerbaijan	**Relevant Parties & Contacts:** ● In Azerbaijan, Bolt is operated by Bolt Services AZ LLC (Company Registration Number 1503463041), located at AZ1025, Baku city, Khatai district, Khojali avenue 55. You can contact our Data Protection Officer at: privacy@bolt.eu. ● The supervisory authority is the Electronic Security Service under the Ministry of Digital Development and Transport of the Republic of Azerbaijan (cert.az; info@cert.az; +994 12 598-90-90). Bolt Services AZ LLC has registered the "Bolt Platform" personal data information system in the State Register of Personal Data Information Systems under registration number IS514775001 dated 13 November 2023. **Legal Basis for Processing:** ● Bolt Services AZ LLC and Bolt Operations OÜ do not rely on Legitimate Interests in the Republic of Azerbaijan to process your personal data. They will instead rely	Consent Compliance with Legal Obligations Vital Interests

Country	Disclosures	Alternative Legal Bases
	on one or more Alternative Legal Bases listed in this table, depending on the circumstances. **Marketing:** ● By consenting to Bolt's Privacy Notice, you are consenting to Bolt sending you marketing communications. You can unsubscribe from these communications at any time within the Bolt App. **Data Transfers outside of Azerbaijan:** ● By consenting to Bolt's Privacy Notice, **you are consenting to the cross-border transfer of your personal data from the Republic of Azerbaijan to Bolt Operations OÜ in the Republic of Estonia and to Amazon Web Services, Inc. data centres in the Federal Republic of Germany**. Both Estonia and Germany are member states of the European Union and apply the EU General Data Protection Regulation, which provides protection of personal data at a level equivalent to that required under the AZ Law on Personal Data, in line with Article 14.2 of that Law. **Your Rights under AZ Law:** ● Pursuant to the Law of the Republic of Azerbaijan No. 998-IIIQ of 11 May 2010 "On Personal Data", and in addition to any other rights granted to you under applicable legislation of the Republic of Azerbaijan, your rights include, without limitation, the right to require legal justification for the collection, processing and transfer of your personal data (Article 7.1.2), to receive	

Country	Disclosures	Alternative Legal Bases
	information about the sources of your personal data (Article 7.1.7), and to have your personal data corrected, blocked or destroyed where it is inaccurate, incomplete or unlawfully obtained. You may exercise these rights by contacting privacy@bolt.eu. **Consent Conditions:** When consenting to this Privacy Notice, you acknowledge that the following information has been provided to you in this Privacy Notice in accordance with Article 8.2 of the Law of the Republic of Azerbaijan "On Personal Data" of 11 May 2010: ● *The owner or operator acquiring your consent.* ● *The purpose of collection and processing of personal data;* ● *A list of personal data, for which consent is granted and a description of the processing operations.* ● *The terms and conditions of retention and deletion of the collected personal data.*	

12. 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.