

Bolt Operations OÜ (Company Registration Number 12417834) located at Vana-Lõuna tn 15, Tallinn 10134, Republic of Estonia, is the controller of personal data of drivers and has appointed a Data Protection Officer (privacy@bolt.eu).

This privacy notice for drivers provides information about how Bolt Operations OÜ (hereinafter “Bolt”, “we”, “us”) processes personal data of persons providing transportation services via the Bolt platform, i.e., drivers. The privacy notice describes what data and why we process, how we keep personal data safe and what choices and controls are available to the data subjects (hereinafter also “you”). You can also find information about your privacy rights in the privacy notice.

If you are a driver on the Bolt platform, please read this privacy notice as it contains important information about the processing of your personal data as well as information about our requirements when you process passengers’ personal data.

Please note that 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 8 ‘*Jurisdictional Disclosures*’ below.

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

1. Personal data we process

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

- **General data** such as name, e-mail, phone number, place of residence (data is provided to us by the driver).
- **Geolocation data** such as geolocation of drivers and driving routes (data is gathered via Bolt system when driver uses Bolt app).
- **Information about vehicles** (including registration number and compliance status) (data is provided to us by the driver).
- **Usage data** such as driver’s engagement and interactions on the marketplace and driver ratings (including Driver Score).
- **Identification/verification data** such as driver’s license, photo, and identity documents.
- **Offences data** such as data about criminal convictions and offences, where permitted under local laws and regulations.
- **Communication and correspondence records** such as: when the driver engages with our in-app chat (“Send a Message” option), or speak with our customer service agents, the date and time of the communication, and its content.
- **Information required under applicable law for taxation purposes:** such as your taxpayer identification number, VAT ID, place of birth, financial account identifier, information of each Member State in which you are a resident.
- **User generated content:** such as audio recordings generated during the trip (as part of our safety toolkit trip audio recording feature, where such feature is available - for more

information, please visit <https://bolt.eu/en/blog/audio-trip-recording-feature/>), or any other content submitted like pictures, videos or files in connection with a customer support request.

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

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

2. Purposes of the processing

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

- For our service provision, we collect and process personal data for the purpose of connecting passengers with drivers to help them move around cities more efficiently.
- For our service provision, geolocation and driving routes are processed to analyse the geographical area and give suggestions to the drivers. If you do not want to disclose your geolocation for passengers, you must close the Bolt app or indicate in the Bolt app that you are offline and currently are not providing transportation services.
- Driver's license, profession, identity documents and criminal convictions and offences are processed to determine the compliance with the legal requirements and the suitability of pursuing a profession as a driver.
- For our service provision, the Bolt app displays driver's photo, name and vehicle details for the passengers to identify driver and vehicle.
- You will receive summaries from the Bolt Driver Portal, which will include your efficiency and ratings as a driver. Summary and ratings about driver are necessary to provide reliable services for passengers.
- Personal data related to instant messages directly in the Bolt app is processed in order to provide service and customer support (including resolving disputes between driver and rider), for security purposes as well as to improve our products and services, and for analysis.
- We collect and use information about a driver's engagement and interaction on the marketplace, and their ratings (including Driver Score) to encourage user safety, ensure drivers comply with the Driver Terms, and make sure we're providing a quality and enjoyable service to everyone. Where the Driver Score drops below a specified threshold, we may issue the driver with a notification or request to, for example, digest some further guidance. If your score continues to drop, you may be temporarily suspended from accessing the Bolt platform. You may appeal any decision to suspend your account. For further information on how to appeal a decision to suspend your account, please see our FAQ on Driver Score here.
- We may process all personal data about you for the establishment, exercise or defence of legal claims.
- Please see additional purposes under legitimate interest (see Clause 3 below).

3. Legal basis

We mainly use following legal basis to process driver's personal data:

- **Performance of Contract:** Personal data is processed for the performance of the contract concluded with the driver. The prerequisite for the use of the Bolt services is the processing of driver's identification and geolocation data. In addition, in order to provide our service to the driver, we process general data, vehicle data, usage data, communications data.
- **Legitimate Interest:** Personal data (excluding special categories of personal data) may be processed on the ground of legitimate interest if we have concluded a legitimate interest assessment, including for the following purposes:
 - - investigating and detecting fraudulent payments, fraud and other malicious or unlawful activities and/or safety or security incidents: general data, identification/verification data, communication data and usage data may be processed;
 - making recordings and logs: depending on your location, we may record messages and orders given both on our premises and/or using means of communication (e-mail, phone calls to customer support and riders, the Bolt app, etc.) as well as information and other activities we have performed. If necessary, we use these recordings for investigations, proof and protection against claims, and/or for quality assurance.
 - technical and cyber security reasons: for example measures for combating piracy and ensuring the security of the service, website, Bolt platform and app as well as for making and storing back-up copies and preventing/repairing technical issues (depending on the issue, all data may be processed); and
 - establishing, exercising or defending legal claims, including: (i) supporting our own internal investigations; (ii) the assignment of claims and the use of debt collecting agencies; and (iii) the use of legal advisors (depending on the claim all data may be processed).
- Depending on the particular circumstances, we may, from time to time rely on **alternative legal basis** when it is more appropriate to do so, these may include:
 - - when it is necessary to comply with a legal obligation such as for processing data when the law requires it, including, for example, if there is a valid legal request to disclose personal information to a third party such as a Court or regulatory authority;
 - when 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; and/or
 - when you have given us clear consent to do so for another specific purpose for which you have been fully informed.

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 above (please see Section 8 '*Jurisdictional Disclosures*' for more information):

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

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

4. Recipients

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

5. Security and access

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

6. Processing passengers personal data

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

7. Access, correction, retention, deletion and data portability

As a data subject you may have the following rights, depending on your state or country of residence:

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

- The retention period for audio recording data generated through our Audio Trip Recording Feature is:
- 24 hours, while stored locally on the device of the person who generates the recording. The recordings are automatically deleted after 24 hours if a report to 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.

8. 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
Malaysia (MY)	• <i>Legal bases</i>: Bolt does not rely on Legitimate Interests in Malaysia to process your personal data. Bolt will instead rely on one or more Alternative Legal bases listed in this table, depending on the circumstances. • <i>Mandatory Provision of Personal Data</i>: Provision of your personal data is mandatory. If you do not provide your personal data, you will not be able to make use of the transportation services available on the Bolt App. • <i>Marketing communications</i>: 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. • <i>International data transfers</i>: By consenting to Bolt's Privacy Notice,	Consent Performance of a Contract Compliance with Legal Obligations Vital Interests

Country	Disclosures	Alternative Legal Bases
	you are consenting to Bolt transferring (exporting) your personal data from Malaysia to other Bolt Group Companies located in other countries. • <i>Enquiries and Complaints:</i> you may contact Bolt's Data Protection Officer by sending an email to privacy@bolt.eu or by telephone +44(0)7778908485. • <i>Language of this Privacy Notice:</i> In the event of any discrepancy or inconsistency between the English version and other language versions of this Privacy Notice, the English version shall prevail.	

9. Dispute resolution

- Disputes relating to the processing of personal data are resolved through customer support (info@bolt.eu) or by contacting Bolt's Data Protection Officer (privacy@bolt.eu).
- Our supervisory authority is the Estonian Data Protection Inspectorate www.aki.ee which can be contacted by email info@aki.ee.

10. Making this notice great

We hope you have found this privacy notice easy to understand.

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