Global Privacy Notice for Drivers

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 Driver is our priority and this includes the safety of your personal data that we process when you use the Bolt services on the “Bolt Platform” (being the technology infrastructure made available by Bolt to facilitate online intermediation of ride-hailing services, including the Bolt Driver Portal and the Bolt Driver app (“Bolt App”)).

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1. About this Privacy Notice

This Privacy Notice (“Notice”) describes how Bolt Operations OÜ (“Bolt”, “We” or “Us”), its group companies and third party partners collect and use the personal data of persons providing transportation services via the Bolt Platform - known as “Drivers” (including persons who are in the process of registering or have registered to Bolt as Driver, as well as persons who have previously owned an account as a Bolt Driver). 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 Driver. 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 Drivers globally who access the Bolt Platform to fulfil passenger transportation services (and other ancillary transportation services such as package delivery services), 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).

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 at https://bolt.eu/legal.
The way we collect, use, and share your personal data may differ depending on the legal requirements of the country or region where you access or provide services through the Bolt Platform. Local laws can influence the types of personal data we process, the purposes for which we process it, the legal basis we rely on and the rights available to you. If you operate or travel across borders, please be aware that the data practices outlined in this Notice may be adapted to comply with the applicable laws of each location. In all cases, we apply safeguards to ensure compliance with relevant legal standards. For further information about the jurisdictional disclosures and differences that may apply to you, please refer to Section 11 'Jurisdictional Disclosures' below.

2. How can 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 our Privacy Web Form available at https://bolt.eu/en/privacy/data-subject/, or raise any privacy-related requests or questions in the Bolt 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 Team.

3. What personal data do we process?

We collect and process personal data;

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

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

Category of Personal Data	**Description of Personal Data**
Personal Data provided by you to Bolt	
Profile Data	We collect personal data about

Category of Personal Data	Description of Personal Data
	you when you register to access the Bolt Platform including: ● Full name ● Email address ● Login name and password ● Phone number, including for Whatsapp use (where applicable) ● City you would like

Category of Personal Data	Description of Personal Data
	to drive in once registered ● Place of residence ● Gender (optional) ● Information about certain family/social relationships (e.g., trusted contacts) (optional) ● Nationality and citizenship

Category of Personal Data	Description of Personal Data
	(where applicable) • Place of birth • Profile Picture • Driver's licence and badge • National Insurance Number (or local equivalent) • Company reference to indicate the fleet you belong to (whe

Category of Personal Data	Description of Personal Data
	n applicable) ● Medical records (in some countries) as evidence of health or fitness to provide the Bolt Services ● Languages certificates (in some countries) ● Referral code ● Dispatch prefe

Category of Personal Data	Description of Personal Data
	renc es and save d locat ions • Prici ng mod el (e.g., cust om prici ng), wher e appli cabl e • Pref eren ces and setti ngs relat ed to the acco unt, such as lang uage prefe renc es, com muni catio n

Category of Personal Data	Description of Personal Data
	preferences, notification settings, and privacy settings.
Vehicle Data	Following market practices and requirements we may collect information about your vehicle and its roadworthiness status, including: ● Vehicle type, model, year and colour ● License plates ● Registrati

Category of Personal Data	Description of Personal Data
	on number • Transport license for Drivers • Transport license for cars • Private hire license • MOT and vehicle logbook (where applicable) • Car insurance details and status and relevant

Category of Personal Data	Description of Personal Data
	insurance proof
Payment Data	Following market practices and requirements we may collect your payment details and banking data, including: ● Payment methods and related payment verification information ● Bank details including account number, sort code,

Category of Personal Data	Description of Personal Data
	financial account identifiers and IBAN details • Transaction details such as charges and disbursement amounts • Transaction history on the Bolt Platform • Taxpayer identification number • VAT

Category of Personal Data	Description of Personal Data
	ID (where applicable) • Earnings reports For billing and invoicing purposes, we also collect full name, postal address, date of birth, country of birth, tax identification numbers with issuing countries and TIN (tax identification number) type.
Identification / Verification Data	We collect identification documents as part of your sign up application. This may include:

Category of Personal Data	Description of Personal Data
	• Your driver's license, transport license and private hire license, which may include name, date of birth and primary address (where applicable) • Other government-issued or natio

Category of Personal Data	Description of Personal Data
	nal identity documents (such as passports, IDs or birth certificates), which may include identification numbers as well as date of birth, gender and photo • Photographs / pictures (suc

Category of Personal Data	Description of Personal Data
	h as a selfie) ● Proof of your address (such as a recent bank statement)
Demographic Data	We collect demographic data, including: ● Age group ● Date of birth ● Gender ● Place of birth
Survey / Interview Data	We collect the contents of your replies or attachments you may send us during the course of

Category of Personal Data	Description of Personal Data
	surveys and interviews that we conduct. During surveys and interviews, we collect data such as your feedback on your satisfaction with the Bolt Platform, your needs, and any issues you encounter while using the Bolt Platform.
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

Category of Personal Data	Description of Personal Data
	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. This also includes metadata relating to the method you use to communicate with Bolt. We also

Category of Personal Data	Description of Personal Data
	collect the feedback and rating you provided to a Passenger after each trip. It is mandatory to give a 1-5* (stars) rating to the Passenger for every trip and leave feedback for those Passengers you rate 1-3* (stars).
Personal Data we collect about you when you use Bolt services	
Account	We

Category of Personal Data	Description of Personal Data
Data	generate and collect information used to identify your specific Bolt account, including: ● Date of creation ● Current status (e.g., active / suspended) ● Records of account changes, including password reset requests
Geolocation Data	We collect data about your precise and/or

Category of Personal Data	Description of Personal Data
	approximate geolocation (including GPS and IP address) depending on your app settings and device permissions, and your driving routes (including the time, the trip progression, the final destination of a trip and average speed), when you open and use the Bolt App.
Order Data	We collect details about scheduled trips and specific trips taken via the Bolt Platform, including: ● Date,

Category of Personal Data	Description of Personal Data
	time and day of the week • Geolocation data, including pick up and drop off locations and driving routes • Actual and estimated distance and duration • Actual and estimated arriv

Category of Personal Data	Description of Personal Data
	al time, pick up distance and duration • Payment history, including estimated and actual order price and currency • Order status, including the status of trips as rejected or cancelled

Category of Personal Data	Description of Personal Data
	• Trip category (such as comfort or premium) • Order number • Irregular activity due to fraud and cancellations We also collect general information about your trips taken via the Bolt Platform, including: • Number of trips that were agreed to be

Category of Personal Data	Description of Personal Data
	performed and were / were not fulfilled • Total time spent providing trips each day • Number and rate of ride requests acknowledged on the Bolt Platform • Averages of statistics such as pick up

Category of Personal Data	Description of Personal Data
	distance, estimated time of arrival, distance travelled, rides that were/were not fulfilled (including order status), earnings and speed If you accept cash-rides, we also collect data relating to your preferred payment

Category of Personal Data	Description of Personal Data
	method (cash or in-app payment method), your on-time or delayed payments to Bolt (such as the commission amount), and in case you get cash-blocked, data about how you repay any commission towards Bolt.
App and Platform Usage Data	We collect personal data via the Bolt App about your use of the Bolt Platform such as your information on how long you've been using the Bolt Platform, your

Category of Personal Data	Description of Personal Data
	engagement and interactions on the Bolt Platform including: ● The dates and times you log-in and log-off the Bolt App ● Periods online and when fulfilling a trip ● Averages of statistics over certain periods such as

Category of Personal Data	Description of Personal Data
	online time, waiting time, utilisation and orders per hour • Bolt App features or pages viewed • Browser type • App crashes • Other system activity
Cookies, SDKs, Analytics, and Third-Party Technologies Data	We collect information through the use of cookies, tracking pixels, data analytics

Category of Personal Data	Description of Personal Data
	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.
Billing	We collect

Category of Personal Data	Description of Personal Data
and Earnings Data	information on applicable pricing structures that you have selected within the parameters provided by the Bolt App (where applicable). We also collect information on the prices applicable to specific trips taken via the Bolt Platform (including applicable taxation and any prepaid amounts), as well as information on your earnings over certain periods of time (including your gross fare,

Category of Personal Data	Description of Personal Data
	balance, trips fees, bonuses, tips and overall distance travelled).
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 Passengers via the Bolt App using the in-app chat function or via internet calls (where

Category of Personal Data	Description of Personal Data
	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

Category of Personal Data	Description of Personal Data
	number with the other, we protect your personal data by using a masked numbers application.
Identification / Verification Data	We generate and collect information (including biometric information, where permitted by law) relating to the status and results of any verification checks.
Warning / Suspension Data	We collect details of suspensions or termination that have been issued to a Driver, including: ● Date(s) on whic h

Category of Personal Data	Description of Personal Data
	warnings or suspensions have been issued • Date of expiry of warnings or suspensions • Reason(s) for the warnings or suspensions • Data on the violation of our Bolt Platform Terms and/

Category of Personal Data	Description of Personal Data
	or local laws • Data on safety incidents
Device Data	We collect data about the devices you use to access our services, including: • Hardware models • Device IP address and other unique device identifiers (such as your UUID) • Device operating syst

Category of Personal Data	Description of Personal Data
	ems ● Browser version and Bolt App version ● Device vendor name ● First and last date of use ● Identity of mobile carrier and manufacturer ● Preferred languages
Consent Data	We collect records of any consents you have

Category of Personal Data	Description of Personal Data
	provided to Bolt, the time and date of such consent, the means of consent, and any related information (e.g., the subject matter).
Personal Data we collect about you from other sources	
Background Check Data	According to relevant local law requirements, we may collect personal data about you from external databases after you submit your

Category of Personal Data	Description of Personal Data
	registration to check you meet the relevant local regulatory requirements to use the Bolt services, including: ● Data about criminal convictions and offences (where required under local laws and regulations) ● Licence status ● Prior addresses

Category of Personal Data	Description of Personal Data
	• Right to work status • Presence on anti-money laundering (AML) or economic sanctions lists (where required under local laws and regulations) This information may also be collected by an authorised third party service provider on

Category of Personal Data	Description of Personal Data
	our behalf.
Identification / Verification Data	Where applicable and according to market practices and requirements, we collect data from third party identity verification providers to verify data related to you, including: ● ID number ● Full name ● Gender ● Address ● Citizenship ● Date of birth ● Place of birth ● Nationality

Category of Personal Data	Description of Personal Data
	• Data related to documents such as document type, issue, number, country of issue, issue and expiry dates and driver's licence category
Driver Compliance Data	To meet local requirements, we may collect personal data from service providers who carry

Category of Personal Data	Description of Personal Data
	out vehicle and driver compliance checks. This includes details about your car insurance, liability insurance (if required), vehicle registration, certifications, and other documents needed to provide transportation services in your area. We may also collect screenshots from public databases as evidence that we verified the documents you submitted during registration.

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 Google, Apple or Facebook, or when a Driver refers you through our referral campaigns, including your: ● Full name ● Email address ● Phone number ● Place of residence
Driver Rating Data	We collect personal data about you, including ratings,

Category of Personal Data	Description of Personal Data
	feedback, complaints, and safety reports from Passengers about the transportation services you provided. These ratings are combined into an average rating. You won't see individual ratings or know which Passenger gave which feedback. However, in the Bolt App, you will be able to see the compliments you received from the last 6 months in relation to completed trips (this will include the

Category of Personal Data	Description of Personal Data
	positive feedback you received after a Passenger left you a 5-star rating).
Fleet Driver Data	We collect personal data about you from fleet owners and fleet partners, such as your email address, your phone number, your profile picture and your referral code. In addition we collect your National ID, driver license, tax identification number, car license number, pictures of vehicle's exterior and interior and personal

Category of Personal Data	Description of Personal Data
	code. Moreover, where permitted by law, we collect background and criminal records data.

4. What purposes do we use your personal data for and what is our Legal Basis for Processing?

The table below sets out:

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

Here is a general explanation of each *'legal basis'* that Bolt relies on to process your personal data to help you understand the table below. 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 (for more information on the legal bases applicable in Tanzania, refer to Section 11, *"Jurisdictional Disclosures"*):

- **Performance of a Contract:** When it is necessary for Bolt (or a third party) to process personal data to provide services under our Bolt Platform terms. Where the legal basis for processing personal data is performance of a contract, and you choose not to provide the information, you may be unable to benefit from the applicable Bolt's services.
- **Legitimate Interests:** When we process your personal data based on legitimate interest grounds. This includes our commercial and non-commercial interests in providing an innovative, personalised and safe service to you, other Drivers, and other third parties (including Passengers). 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 can 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, 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 that took place prior to you giving your consent to us.

- **Compliance with Legal Obligations:** When we must process your personal data to comply with laws or regulations in the markets we operate in, such as to comply with our licensing conditions and 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.

Purpose of processing	Legal Basis	Categories of Personal Data
For the provision of the Bolt services (including the Bolt Platform)		
To create, update and maintain your Bolt account We collect information about you during the registration process to direct you to the appropriate registration flow and to enable you to create a Bolt account.	• *Performance of a Contract* • *Legitimate Interests* – It is in our interest, as well as in the interest	• Account Data • Profile Data • Fleet Driver Data • Device Data

Purpose of processing	Legal Basis	Categories of Personal Data
We also process certain information to enable you to switch between different profiles (for example, profiles where you are acting on your own behalf as an independent service provider or profiles where you are acting on behalf of another service provider).	of our Passengers and Drivers, to protect the security and integrity of the Bolt Platform and its users.	
To authenticate your account and verify your identity We collect information to verify who you say you are and in certain circumstances to	● *Performance of a Contract* ● *Compliance with Legal Obligations* ● *Legit*	● Account Data ● Profile Data ● Identification/ Verification Data ● Device Data ● Geolocati

Purpose of processing	Legal Basis	Categories of Personal Data
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, periodically or as a result of unusual activity being detected on your Bolt account) and you are not able to verify your identity, the Bolt services will be suspended to prevent harmful activities (including fraudulent activities) until the verification	*imate Interests* - It is in our interest and in the interest of our Passengers to prevent and address unauthorised uses of Bolt accounts and violations of our Terms and Conditions	on Data • App and Platform Usage Data • Consent Data • Order Data

Purpose of processing	Legal Basis	Categories of Personal Data
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 may 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	which increases Passengers' safety. • *Consent* - Your opt-in consent will be required for us to proceed with biometric verification checks.	

Purpose of processing	Legal Basis	Categories of Personal Data
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 Team.		
To enable, improve and customise the transporta	● *Performance of a Contract*	● Account Data ● Profile Data

Purpose of processing	Legal Basis	Categories of Personal Data
tion services and other services and features like delivery of packages, by connecting Passengers requesting Bolt services with Drivers We use automated processes to ensure that Drivers and Passengers are connected quickly and efficiently. These processes are triggered when a Passenger requests a ride, and we evaluate certain data to	• *Legitimate Interests* - It is in our interest and in the interest of our Passengers and Drivers to ensure that Passengers and Drivers are connected effectively, and that other servi	• Geolocation Data • Fleet Driver Data • Vehicle Data • Order Data • Communication Data • Driver Rating Data • User Generated Data • Billing and Earnings Data

Purpose of processing	Legal Basis	Categories of Personal Data
determine appropriate trip(s), optimize trip matching, and improve the overall experience on the Bolt Platform, including: ● To match available Drivers with Passengers, we process Geolocation Data and Order Data to determine the most suitable Driv	ces and features are provided in an efficient and user-friendly manner.	

Purpose of processing	Legal Basis	Categories of Personal Data
er for each trip. This includes considering estimated arrival times, geographic proximity to Passengers and historical activity. • Drivers can set certain preferences, such as prefe		

Purpose of processing	Legal Basis	Categories of Personal Data
rred destinations, preferred radius or service categories (e.g., larger vehicles or pet-friendly rides). Orders outside the set criteria may be deprioritized by Bolt or presented as		

Purpose of processing	Legal Basis	Categories of Personal Data
optional. • If a Driver cancels or rejects an order, or if a Passenger cancels, we may prevent immediate re-matching between the same Driver and Passenger for a short period to		

Purpose of processing	Legal Basis	Categories of Personal Data
improve efficiency and reduce repeated cancellations. • We monitor order acceptance and completion patterns to provide contextual feedback to Drivers. This includes insights on		

Purpose of processing	Legal Basis	Categories of Personal Data
ratings, cancellations, and customer support interactions to help improve service quality. We are continually developing and improving our processes for connecting Drivers with Passengers, and may consider different factors depending on the location in which you are using Bolt's services.		

Purpose of processing	Legal Basis	Categories of Personal Data
During (and for a defined period after) an active order, we also connect Drivers and Passengers through Bolt's in-app call and messaging system.		
To process and verify Driver registrations and compliance documentation We process certain data to facilitate the registration and compliance verification process for Drivers, Fleet Owners	• *Performance of a Contract* • *Legitimate Interests* – It is in our interest, and in the interest of our Drivers	• Account Data • Driver Compliance Data • Profile Data • Identification / Verification Data • Background Check Data

Purpose of processing	Legal Basis	Categories of Personal Data
and Fleet Companies, and vehicle registrations: ● When a Driver submits a registration form, the provided Profile Data and Identification / Verification Data (including uploaded documents) are automatically	and Fleet Owners, to streamline the registration process, ensure compliance with regulatory requirements, and facilitate faster activation. ● *Compliance with Legal Obligations*	

Purpose of processing	Legal Basis	Categories of Personal Data
processed through our internal verification platform. • Documents undergo initial verification (including by automated means). If all required documents pass the checks, compliance		

Purpose of processing	Legal Basis	Categories of Personal Data
rules are applied to ensure regulatory and platform requirements are met. • Uploaded documents may be automatically processed to determine compliance with platform and regulatory requirements.		

Purpose of processing	Legal Basis	Categories of Personal Data
If a document meets the necessary criteria, it is automatically approved. If it does not pass automated checks, it is sent for manual review, but no documents are automatically declined. • If		

Purpose of processing	Legal Basis	Categories of Personal Data
certain documentation fails verification, access to the Bolt services may be suspended until the verification process is completed.		
To make sure your ride is the quickest and the most convenient and smooth for everyone We collect	• *Legitimate Interests* - It is in our interests and in	• Account Data • Geolocation Data • Order Data

Purpose of processing	Legal Basis	Categories of Personal Data
Geolocation Data and data on the routes taken during the trip to analyse geographic coverage. This lets us improve recommendations to Drivers about the most efficient routes and facilitate the trip in the best possible way.	the interests of our Drivers to facilitate the most convenient trip.	
To calculate prices and process payments We use automated processes to calculate the prices of the trips. These processes are triggered when a Passenger requests a	• *Performance of a Contract* • *Legitimate Interests* - It is in our interests and in the	• Account Data • Payment Data • Billing and Earnings Data • Geolocation Data • Order Data

Purpose of processing	Legal Basis	Categories of Personal Data
ride, and they evaluate certain data including pickup and drop-off locations, estimated distance, trip duration, and demand conditions to determine both estimated and final trip fees. These fees may be influenced and adjusted based on various factors, including: ● Where applicable, drivers may set a preferred per-k	interests of our Drivers to ensure that payouts are processed efficiently, as well as to ensure fair pricing, optimize Driver earnings, and make ride matching more efficient.	● App and Platform Usage Data ● Profile Data ● Driver Rating Data

Purpose of processing	Legal Basis	Categories of Personal Data
ilometer rate within the parameters set by the Bolt App. If an order's calculated price falls below the Driver's set rate, the trip will not be offered to that Driver. Minimum and maximum		

Purpose of processing	Legal Basis	Categories of Personal Data
price limits per kilometer apply, varying by city. • We may apply multipliers to an estimated trip fee to reflect market conditions and to optimize trip matching. For example,		

Purpose of processing	Legal Basis	Categories of Personal Data
fees may increase where Passenger demand is significantly higher than available Drivers, or to compensate Drivers during low-demand times (e.g. fewer orders per hour).		

Purpose of processing	Legal Basis	Categories of Personal Data
Alternatively, Bolt's commission may be adjusted dynamically to increase the appeal of a low-demand trip to Drivers. We are continually developing and improving our processes for calculating prices, and may consider different factors depending		

Purpose of processing	Legal Basis	Categories of Personal Data
on the location in which you are using Bolt's services. Additionally, we process Payment Data to facilitate Passenger payments on behalf of Drivers and Profile Data to process Driver payouts. We also use your Billing and Earnings Data to generate financial documents such as invoices, balance reports and tax reports.		
To facilitate additional services and programs with third parties	• *Performance of a Contract* • *Legitimat*	• Account Data • Order Data • App and

Purpose of processing	**Legal Basis**	**Categories of Personal Data**
We will use Order Data and App and Platform Usage Data, where applicable, to confirm if a Driver is eligible to incentive programs and to give Bolt points or equivalents to the Drivers. Partners can also have visibility of Drivers' data (depending on the specific partner, the data can include name, email address, referral code, phone number, information on the	*e Interests* - It is in our interests and in the interests of our Drivers to facilitate participation in the Bolt Rewards program and receive benefits.	Platform Usage Data ● Driver Rating Data ● Payment Data ● Profile Data ● Fleet Driver Data ● Vehicle Data

Purpose of processing	Legal Basis	Categories of Personal Data
Driver's tier, photograph and licence plate number) when they want to redeem specific benefits. We also process certain data to determine your eligibility for discounts facilitated by third parties.		
To connect Drivers with Fleet Partners through Bolt Vehicle Marketplace We process your data to facilitate connections between drivers and Fleet Partners	• *Legitimate Interests* – It is in our interests, and in the interests of both our Driv	• Account Data • Demographic Data • Profile Data

Purpose of processing	Legal Basis	Categories of Personal Data
via Bolt Vehicle Marketplace, a feature that allows Fleet Partners to list available vehicles for the Drivers to connect with them directly. As part of this process, we facilitate Fleet Partners to ask drivers for information, such as age, gender, home address, experience in ride-hailing, and expected working hours. This information helps Fleet Partners determine eligibility	ers and Fleet Partners, to facilitate connections through the Bolt Vehicle Marketplace feature.	

Purpose of processing	Legal Basis	Categories of Personal Data
and match drivers with available vehicles. Some of these questions are optional, and all information collected is used solely for evaluating applications within the Bolt Vehicle Marketplace feature.		
To ensure marketplace efficiency and compliance with our Bolt Platform Terms We process your data to enable Fleet Owners and Fleet Partners to manage, supervise and	• *Performance of a Contract* • *Legitimate Interests* - It is in our interests and in the interest	• Account Data • Profile Data • Fleet Driver Data • Vehicle Data • Order Data • Driver Rating Data

Purpose of processing	Legal Basis	Categories of Personal Data
support Drivers who operate under their fleet via the Bolt Platform. This includes access via the Fleet Owner Portal to Driver activity, compliance documentation, communication data (if submitted through the fleet interface) and order history to ensure platform and legal obligations are met. Fleet Owners may also receive general account status updates (e.g.,	of Fleet Owners and Drivers to ensure transparency, operational oversight and compliance with local regulatory and platform requirements.	• Warning / Suspension Data • Driver Compliance Data • Communication Data • Payment Data • Geolocation Data • App and Platform Usage Data • Billing and Earnings Data

Purpose of processing	Legal Basis	Categories of Personal Data
suspension) for operational awareness but do not receive full safety or incident reports.		
For Customer Support		
To provide customer support services and receive and process feedback We process your personal data to investigate and address requests for support, including reported safety incidents / alleged criminal acts and complaints submitted	• *Performance of a Contract* • *Legitimate Interests* - It is in our interest and in the interest of our Drivers to support them	• Account Data • Profile Data • Communication Data • User Generated Data • Warning and Suspension Data • Driver Rating Data

Purpose of processing	Legal Basis	Categories of Personal Data
to us. We also use the data you share to address possible violations of our Bolt Platform Terms and to improve the Bolt Platform. For safety related incidents, your Warning and Suspension Data will be consulted by Bolt's Customer Support and/or Safety Team when investigating a safety/criminal incident on the Bolt Platform involving you. The Teams will also review Passengers' reasons	throughout their use of the Bolt Services and continuously improve and develop the customer support we provide. In addition it is in our interest and interest of our Drivers and Pass	• Device Data • Identification / Verification Data • Geolocation Data • App and Platform Usage Data • Order Data

Purpose of processing	Legal Basis	Categories of Personal Data
for issuing low ratings to Drivers, and the circumstances surrounding potential safety incidents. We may use some automated processes for basic 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.	engers to address threats and abuse and promote safety, integrity and security on the Bolt Platform to ensure our services are used in accordance with the Bolt Platform Terms.	

Purpose of processing	Legal Basis	Categories of Personal Data
	• *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.	
For Safety and		

Purpose of processing	Legal Basis	Categories of Personal Data
Security		
To enable and provide safety features We use data to ensure Bolt services are secure and have implemented a variety of safety features to enhance the safety of our Bolt Platform users. Depending on your country of operation, these may include: • *Audio Trip Recording* - enabling Passengers and	• *Legitimate Interests*- It is in our interest and in the interests of our Drivers to enhance safety, integrity and security by offering additional safety functionalities as	• Account Data • Communication Data • User Generated Data • Profile Data • Device Data • Geolocation Data • Order Data • App and Platform Usage Data • Demographic Data

Purpose of processing	Legal Basis	Categories of Personal Data
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	part of Bolt's Safety Toolkit which facilitate assistance in an emergency case and protect your life, health and integrity. It is also in the interest of our Drivers who initiate	

Purpose of processing	Legal Basis	Categories of Personal Data
Bolt, if submitted by a Passenger or Driver; • *Driver Emergency Assist* - enabling Drivers to call the Police, the local authorities or the emergency services via our Driver Eme	the Audio trip recording to ensure their own (or others) safety and the possibility to provide evidence of the safety or security incident. • *Vital interests* - We process this information wher	

Purpose of processing	Legal Basis	Categories of Personal Data
rgency Assist feature and the Customer Support to follow up with you on the safety or security incidents; or • *Trip Safety Monitoring* - enabling Bolt to send Passengers and Drivers	e your vital interests require protection, such as in the case of emergencies and safety incidents, when using safety features like the Driver Emergency Assist or the Trip Safe	

Purpose of processing	Legal Basis	Categories of Personal Data
notifications and check if you are okay or need assistance from Bolt Customer Support or the Local Authority; • *Unsafe Area Alert* - a feature that warns drivers about Unsafe	ty Monitoring.	

Purpose of processing	Legal Basis	Categories of Personal Data
Areas while they are providing transportation services. • *Driver Trip Sharing* - enabling Drivers to share a link with the real-time trip information externally (Email, SMS, WhatsApp, Tele		

Purpose of processing	Legal Basis	Categories of Personal Data
gram), so someone else can follow the ride statuses and locations. • *Women for Women Category* - enabling women Drivers to select a preference to accept only women Passengers.		

Purpose of processing	Legal Basis	Categories of Personal Data
• *Trusted Contact* - enabling Drivers to include information on their account about friends and relatives who can be contacted by Bolt in the event of an emergency.		
To determine an	• *Legitimate*	• Account Data

Purpose of processing	Legal Basis	Categories of Personal Data
average Driver Rating and identify potential non-compliance with our Bolt Platform Terms To provide a safe and accountable marketplace environment, Passengers may rate and provide feedback on their experience after each trip. We use this information to calculate your average Driver Rating and may apply a minimum threshold for continued access to	*Interests*- It is in our interest and in the interest of our Drivers and Passengers to enhance quality, safety and trust within the Bolt Platform. To encourage positive and respectful	• Profile Data • Geolocation Data • OrderOrder Data • Driver Rating Data

Purpose of processing	Legal Basis	Categories of Personal Data
the Bolt Platform. The Driver Rating feature allows Passengers to make informed choices by showing the average rating a Driver has received from other Passengers. In addition, to provide reliable services to Passengers, we may monitor Drivers's compliance to our Bolt Platform Terms to ensure that Drivers: ● do not unnecessarily create safety	interactions between Passengers and Drivers on the Bolt Platform and provide a safe, hassle-free and pleasant environment and experience. It is also in our interest to ensure and	

Purpose of processing	Legal Basis	Categories of Personal Data
risks for the Passengers of the Bolt Platform; • do not unnecessarily interfere with the arrangement of services via the Bolt Platform; and/or • do not act in a manner that is materially inco	to enforce our services are used in accordance with the Bolt Platform Terms.	

Purpose of processing	Legal Basis	Categories of Personal Data
nsistent with a genuine intention to provide services via the Bolt Platform.		
To prevent, detect, and address harmful activities (including fraudulent activities) and ensure platform integrity We process certain data to identify and mitigate harmful activities, including fraudulent	• *Legitimate Interests* - It is in our interest, as well as the interest of our Drivers and Passengers, to prev	• Account Data • Device Data • Geolocation Data • Profile Data • Fleet Driver Data • Payment Data • Order Data • App and

Purpose of processing	Legal Basis	Categories of Personal Data
behaviour, unauthorized use of accounts, and other actions that may compromise the safety and integrity of the Bolt Platform: ● Before processing payouts, a review is conducted to detect unusual transactions. If suspicious orders are identified, payouts	ent and address fraud, unauthorized account use, and other activities that compromise safety, security, and platform integrity. ● *Consent* - Your opt-in will be required for us to proceed with	● Platform Usage Data ● Identification / Verification Data ● Background Check Data ● Communication Data ● User Generated Data ● Consent Data

Purpose of processing	Legal Basis	Categories of Personal Data
may be temporarily held for further manual review. • Fraud prevention measures are applied to promotional campaigns for both Drivers and Riders. These checks review cam	verification and background checks.	

Purpose of processing	Legal Basis	Categories of Personal Data
paign eligibility and detect abuse, such as fraudulent enrollments or improper use of discount codes. • We analyze Order Data to identify anomalies such as pick up deviations,		

Purpose of processing	Legal Basis	Categories of Personal Data
route deviations, uncompleted trips, unrealistic trip durations / distances, or pricing discrepancies. If irregularities are detected, corrective actions may be taken, including price adjustments		

Purpose of processing	Legal Basis	Categories of Personal Data
or order cancellation. • Drivers who request early payouts are subject to verification based on trip completion history, payment reliability, and refund patterns to prevent fraudulent		

Purpose of processing	Legal Basis	Categories of Personal Data
withdrawals. • Additionally, we may review in-app communication between Drivers and Passengers to detect fraudulent or illegal activity. If needed, corrective measures will be taken in		

Purpose of processing	Legal Basis	Categories of Personal Data
compliance with applicable regulations. In addition to automated fraud detection, cases flagged for suspicious activity undergo manual review by our team to ensure fair decision-making. Our fraud detection systems analyze patterns in Order Data, App and Platform Usage Data, Geolocation Data, and Profile Data to identify		

Purpose of processing	Legal Basis	Categories of Personal Data
potential fraudulent behavior. Automated checks are used to flag suspicious activity, but no final decisions—such as account suspensions or terminations—are made without human review.		
To unmatch a Driver and a Passenger in order to ensure a safe platform environment for Drivers and Passengers If either you or a Passenger gives a 1-star rating after a trip, that	• *Legitimate Interests* - It is in our interest and in the interest of our Drivers and Passenge	• Account Data • Driver Rating Data • User Generated Data • Profile Data • Order Data

Purpose of processing	Legal Basis	Categories of Personal Data
person can choose to block future rides with the other. Just tap the 'Block Future Requests' button. Once selected, you won't be matched with that Passenger again, unless one of your accounts is deleted.	rs to provide a safe, hassle-free and pleasant environment and experience.	
To temporarily suspend and/or terminate Drivers who do not comply with our Bolt Platform Terms If you continue to violate our Bolt Platform Terms after we've	• *Legitimate Interests* - It is in our interests and in the interests of our Drivers and	• Account Data • Profile Data • Trip Data • Communication Data • Driver Rating Data • War

Purpose of processing	Legal Basis	Categories of Personal Data
warned you, your Driver account may be temporarily suspended or permanently closed.For information regarding how to object to the above activities, please see Section 9 “What are your rights?”.	Passengers to provide a quality, reliable and enjoyable service to everyone and encourage and ensure a safe use of the Bolt platform and compliance with the Bolt Platform Terms. • *Perf*	ning / Suspension Data

Purpose of processing	Legal Basis	Categories of Personal Data
	ormance of Contract	
To implement feature access restrictions in cash-heavy markets where suspicious activities regarding commission payments to Bolt are detected and reviewed (e.g. cash-block limits). We implement access restrictions to certain features based on unusual activities, as defined by our experience with our Bolt Platform	• *Legitimate Interests* - It is in our interests to have control over the payments (the commission amounts) that are due to Bolt and the relevant debt of the Driv	• Account Data • Profile Data • Order Data • App and Platform Usage Data

Purpose of processing	Legal Basis	Categories of Personal Data
users. We define these unusual activities through various parameters. When a specific threshold of a parameter is reached, access to the corresponding feature is restricted. We set a restriction on cash rides based on the risk assessment. When there's an increased risk of unpaid commissions, the ability to perform further cash rides is restricted to prevent financial losses.	ers and get Drivers cash-blocked when they exceed a certain limit.	

Purpose of processing	**Legal Basis**	**Categories of Personal Data**
To do that, we check App and Platform Usage Data and Profile Data to determine the Driver's eligibility to perform more cash rides. We retain the data necessary for this purpose for up to one year, considering both lifetime behavior (past 12 months) and recent activity (last 90 days).		
To ensure the security of the Bolt services (including the Bolt Platform) Depending on the issue, all	● *Legitimate Interests* - It is in our interest and	● All Data

Purpose of processing	Legal Basis	Categories of Personal Data
Data may be used for technical, fraud and cyber security reasons: for example measures for combating piracy and ensuring the security of the service, website, and Bolt Platform as well as for making and storing back-up copies and preventing/ repairing technical issues.	in the interest of our Drivers and Passengers to protect, guard and maintain Bolt's security systems, respond to suspected or actual criminal acts and repair any technical issues.	

Purpose of processing	Legal Basis	Categories of Personal Data
For marketing and advertising		
To market and advertise Bolt services and those of partners according to your preferences and measure the effectiveness of Bolt's ads on third party apps and websites This includes using your personal data to send and personalise emails, text messages (including WhatsApp messages), push notification	• *Legitimate Interests* - It is in our interest and in the interest of our Drivers to inform them about our services and features or those offered by	• Profile Data • App and Platform Usage Data • Device Data • Cookies, SDKs, Analytics, and Third-Party Technologies Data • Consent Data

Purpose of processing	Legal Basis	Categories of Personal Data
s, in-app messages and other communications marketing Bolt's products, services, features, offers, promotions, news and events of Bolt and our partners, as well as to facilitate your participation in competitions, campaigns, giveaways, sweepstakes, and events. We use pixels and similar technologies to track which emails are opened and which links are clicked by you, to help us	Bolt partners. It is also in our interest to promote and advertise our services, including engaging in contextual (non-data driven) and personalised direct marketing and advertising, anal	

Purpose of processing	Legal Basis	Categories of Personal Data
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 and conversion analytics.	ytics, and measurement of ad performance, to expand our user base by deepening relationships with existing Drivers and developing new ones. You can opt out of these communicatio	

Purpose of processing	Legal Basis	Categories of Personal Data
	ns 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 setti	

Purpose of processing	Legal Basis	Categories of Personal Data
	ngs. ● *Consent* - 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	

Purpose of processing	Legal Basis	Categories of Personal Data
	to provide consent for specific purposes and processing activities, with details on how to withdraw consent, including through your profile settings. • *Performance of Contract* - We may proc	

Purpose of processing	Legal Basis	Categories of Personal Data
	ess your personal data to enable your participation in a competition, campaign, or event, subject to the specific terms of each..	
For car branding purposes We will use and share your email address, phone number, car model and licence	• *Consent* - Your opt-in will be required for us to com	• Profile Data • Vehicle Data • Consent Data

Purpose of processing	Legal Basis	Categories of Personal Data
plates with our branding partners to contact you and organise the branding of your car.	plete the car bran ding.	
For service communications		
To communicate with you, including sending service-related / operational communications Your name, phone number and email address will be used to communicate and send you communications via email, text	• *Performance of Contract* • *Legitimate interest* - It is in our interest and in the interest of our Drivers to	• Profile Data

Purpose of processing	Legal Basis	Categories of Personal Data
messages (including WhatsApp messages), push notifications, in-app messages, and updates and reports, including about you and your use of the Bolt Platform and experience.	inform them about updates and reports relating to the Bolt Platform's services and operations, as well as any other relevant communications and to deepen our relationships with existi	

Purpose of processing	Legal Basis	Categories of Personal Data
	ng Drivers.	
To get your feedback on your level of satisfaction with Bolt services through surveys and interviews to take informed business decisions These surveys and interviews are designed to understand your feedback on our services, to measure your satisfaction and perception of safety and enable us to take actions to improve the	• *Consent* - Your opt-in consent will be required. • *Legitimate Interests* - It is in our interest and in the interest of our Drivers to provide a satisfying driver experienc	• Profile Data • Demographic Data • Survey/Interview Data • Consent Data

Purpose of processing	Legal Basis	Categories of Personal Data
experience. The Survey and Interview Data may be shared with research partners we use to understand your feedback.	e and to learn about their awareness / feedback on the Bolt service.	
For research and improvement of the Bolt services		
To perform research, testing, and analytics to understand better our business and services and improve	• *Legitimate Interests* - It is in our interest to measure the use	• Account Data • Profile Data • Geolocation Data • Order Data • App and

Purpose of processing	Legal Basis	Categories of Personal Data
our websites and apps We collect data, for example, Geolocation Data, such as the routes taken, to analyse the geographic coverage to make recommendations to you or we collect for example App and Platform Usage Data to revise our security practices, algorithms, machine learning and other modeling and improve our operations, processes and platform.	of our services to inform business decisions and to enable provision of accurate and reliable reporting and to continuously improve and develop the services we provide. • *Con*	Platform Usage Data • Communication Data • User Generated Data • Device Data • Consent Data

Purpose of processing	Legal Basis	Categories of Personal Data
	sent - 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,	

Purpose of processing	Legal Basis	Categories of Personal Data
	including through your profile settings.	
To develop new products, features, partnerships, and services	• *Legitimate interests*- It is in our interest and in the interest of our Drivers to develop and adopt new features and improve the Bolt Platf	• Account Data • Profile Data • Geolocation Data • Order Data • App and Platform Usage Data • Communication Data • User Generated Data • Device Data

Purpose of processing	Legal Basis	Categories of Personal Data
	orm.	
To prevent, find, and resolve software or hardware bugs and issues We also collect certain information to resolve quality issues related to your use of the Bolt App.	• *Legitimate interests*- It is in our interest and in the interest of our users to provide a hassle free and reliable service.	• Account Data • Profile Data • Geolocation Data • User Generated Data • Communication Data • Device Data • App and Platform Usage Data • Order Data
For Legal Proceedings and Compliance		

Purpose of processing	Legal Basis	Categories of Personal Data
with the Law		
To look into and respond to complaints or disputes about your use of Bolt, and to meet legal obligations or respond to requests from courts, regulators, or law enforcement Depending on the claim, all data may be processed for establishing, exercising or defending legal claims, including; • supportin	• *Compliance with Legal Obligations* - We process personal data to comply with an obligation, when there is a request from a regulator, law enforcement or other gove	• All Data

Purpose of processing	Legal Basis	Categories of Personal Data
g our own internal investigations • the assignment of claims and the use of debt collecting agencies; and • the use of legal advisors. In some cases, we have a legal obligation to share your information with third parties - for example, if	rnmental body. • *Legitimate Interests* - In the context of litigation or other disputes, it is in our interest to protect our interests and rights, our Drivers or others, including as	

Purpose of processing	Legal Basis	Categories of Personal Data
we receive a court order or need to cooperate with a data protection authority, or other relevant authority. We also respond to lawful requests from police or other public bodies, especially in emergencies, legal disputes, or where someone's safety is at risk. We always check that we have a lawful basis to share your data and keep a record of the decision.	part of investigations, regulatory inquiries or litigation.	
To fulfill our legal and regulatory	● *Compliance with*	● Profile Data ● Pay

Purpose of processing	Legal Basis	Categories of Personal Data
obligations (including tax obligations to comply with tax legislation) and where applicable, KYC (know-your-customer) and AML (anti-money laundering) obligations under applicable law.	*a legal obligation*	ment Data ● Billing and Earnings Data ● Identification/Verification data ● Order Data
To financially manage Bolt's business We process certain data for general financial management purposes, including corporate audit.	● *Legitimate Interests* - It is in our interests to manage our organisation's finan	● Account Data ● Profile Data ● Payment Data ● Order Data

Purpose of processing	Legal Basis	Categories of Personal Data
	ces in an operationally effective manner.	
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

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 take steps to check 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), Partners and their representatives who may similarly use your personal data in the manner described in this Notice. If Bolt Group Companies are responsible for processing your personal data, they may share your personal data with Bolt Operations OU as the

Category of Recipients	Description
	main data controller for Bolt.
Our Passengers	Your name and photo is disclosed to Passengers, when you have offered an order. When you get matched with a Passenger and decide to offer the ride, Passengers will see your name and photo vehicle make, model, colour and vehicle photo, license plates, phone number, photo and geolocation data (before and during the trip). Additionally,

Category of Recipients	Description
	Passengers will have access to your average rating and total number of trips. Passengers also see your personal data like your full name, service license number (if applicable), the registration number of the vehicle, the date, the time, the start and end locations and route map in the receipt.
Other Drivers	If you are referred to us by an existing Driver, we'll receive personal data (referral

Category of Recipients	Description
	code) about you from other Drivers participating in the Bolt Driver Referral Programme.
Bolt Business Clients and other Bolt account owners	Some rides you offer may be requested or paid for by others than the Passengers 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, your license plates and trips (pick up and drop off points). This information will be

Category of Recipients	Description
	disclosed to our Business Clients via reports they can access on their Business Accounts.
Bolt Partners	Depending on your location, your personal data may be disclosed to third-party vehicle suppliers and/or Fleet Partners (including rental and proxy fleets). Via the Fleet Owner Portal, they will have access to your order history and vehicles, including the model, license plate of such

Category of Recipients	Description
	vehicles and transport license expiration dates, your name, mobile phone number, email and they will view your Bolt Platform activities, including possible violation of our Bolt Platform Terms and finished order metrics, your earning reports and payouts, your receipts and/or invoices issued by you to the Passengers after the ride taken via the Bolt Platform, your receipts

Category of Recipients	Description
	and/or invoices issued by Bolt to you, and by you to Bolt, compensation invoices issued by Bolt to the Fleet Partners, and the terminations/suspensions imposed on you or any other persons authorised to provide transportation services on behalf of you.
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

Category of Recipients	Description
	you about promotional events and provide you with information and marketing messages about our products or services that may interest you. When you also enroll in partnerships programmes (discounts/ loyalty programmes) some limited data will be shared with these partners such as information about your use of the programmes. These parties will use your personal data in accordance with their

Category of Recipients	Description
	own privacy policies as separate data controllers. 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.
Insurers	We will share your data with insurers, where you, or a family member in

Category of Recipients	Description
	your absence, request for a claim to be processed, to facilitate the processing of insurance claims and for reporting purposes due to contractual requirements from the insurers. We will also share data with insurers, to manage and settle claims to avert further damage to us.
Third Party Service Providers	Our third party vendors and other service providers and contractors have access to your

Category of Recipients	Description
	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 fulfillment, background checks and identity/verification processes, payment processing, and facilitation, insurance coverage (data sharing

Category of Recipients	Description
	with insurers, where you, or a family member in your absence request for a claim to be processed, to facilitate the processing of insurance claims and for reporting purposes due to contractual requirements from the insurers) and financial instruments, customer support, fraud prevention and detection, data enhancement, web hosting and cloud storage, research,

Category of Recipients	Description
	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 your driving routes with Google in connection with the use of Google maps in our apps and data like your license plates or other data with airports in case it is required by the airport as a condition

Category of Recipients	Description
	for operating at the airport.
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 sale, 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

Category of Recipients	Description
	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 policy. We may also need to check your information against public and/or government databases to confirm the validity of certain compliance

Category of Recipients	Description
	documents that you have provided.
Law Enforcement, Data Protection, Tax, Transport and Licensing Authorities and other relevant Third Parties	We may disclose information under a court order or where we cooperate with a data protection supervisory authority or a licensing authority in handling complaints or investigations. For example certain information must be recorded and shared with the relevant licensing authority when investigating complaints, including the complainant's details, complaint

Category of Recipients	Description
	details, driver involved, the date of the alleged incident, and the details of the investigation and actions taken as well as the date the complaint was resolved. We may also share your personal data with law enforcement or other public authorities, such as tax, transport and licensing authorities, including responding to requests when the information is required by law or furthers a public

Category of Recipients	Description
	interest task or for example as a result of DAC7 implementation. We may also share your data to other relevant third parties, including emergency services, where the information furthers a public interest task, is necessary in the context of a legal dispute, and/or someone's life is at risk. In any scenario, we will take steps to ensure that we have a lawful basis on which to share the information

Category of Recipients	Description
	, 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 or region, including Tanzania, 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 the Bolt Services and for the purposes described above.

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 some of the categories of our retention periods:

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

Retention Periods Criteria	Description
specific period of time	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, including your selfie and identification documents, until your Bolt account is deleted unless further retention of certain

Retention Periods Criteria	Description
	personal data are required for the purposes described in the second table below.

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

Category of Retention Periods	Description
Accounting and financial reporting purposes	We retain data for 10 years after the last trip if your personal data is necessary for accounting purposes and for 3 years after the last trip regarding financial data in relation to transportation services provided to Passengers.
Provision of services purposes	We retain your data for the life of Drivers'

Category of Retention Periods	Description
	accounts if such data is necessary to provide our services. But if your account will be closed the personal data will be deleted 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

Category of Retention Periods	Description
	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, if 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

Category of Retention Periods	Description
	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 60 days from the last communication and in Bolt's databases for 3 years from the last communication. Instant messages between Drivers and Passengers are kept in the Bolt

Category of Retention Periods	Description
	App only until the order is completed and for 30 days 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

Category of Retention Periods	Description
	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.
Geolocation Data	We retain your Geolocation Data for 2 years from the

Category of Retention Periods	Description
	time it is collected.

9. What are your rights?

Where applicable, you have following data subject 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. Depending on where you are, you can access a copy of your personal data via our data export tool by navigating to the 'Privacy' section of the Bolt App.
- **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). This includes the right to object to our processing of your personal data for direct marketing purposes. 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). Where we rely on consent as the primary legal basis to process your personal data, your withdrawal of your consent may affect your ability to use the Bolt Platform. 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 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 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
Tanzania TZ	• Bolt does not rely on Legitimate Interests in Tanzania to process your personal data. Bolt will instead rely on one or more Alternative Legal	Consent Performance of a Contract Compliance with Legal Obligations Vital Interests

Country	Disclosures	Alternative Legal Bases
	Bases listed in this table, depending on the circumstances. ● 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. ● *International Data Transfers* We may transfer your personal data to other Bolt and or Bolt affiliate companies, or trusted service providers located in jurisdictions outside the United Republic of Tanzania (URT), including to the European Union (including Germany and Estonia). By accepting this Privacy Notice, you consent to the transfer of your personal data from the United Republic of Tanzania (URT) to such jurisdictions, necessary to enable us to provide you our services or products. All international transfers are carried out under Bolt's oversight and in accordance with applicable data protection laws, including Tanzania's data protection laws and any other relevant legal and regulatory requirements.	

Country	Disclosures	Alternative Legal Bases
	Where the receiving country is not recognized as providing a level of protection equivalent to United Republic of Tanzania (URT) data protection standards, we will ensure that appropriate safeguards are implemented, including entering into legally binding agreements with recipients that reflect applicable data protection standards and ensure adequate protection of your 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.