

Global Privacy Notice for Bolt Food Clients (Eaters)

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

Date when this Privacy Notice was last updated: 1 June 2025

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1. About this Privacy Notice

This Privacy Notice (“Notice”) describes how Bolt Operations OÜ (“Bolt”, “We” or “Us”) and its group companies and third party partners collect and use the personal data of persons arranging orders and delivery of food and goods through the Bolt Food and Bolt Market Platforms (“Bolt Food Platform” or “Bolt Food App”) – each known as a “Client”. 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 Client. This Notice lets you know how we promise to look after your personal data and tells you about your privacy rights and the choices and controls available to you.

This Notice applies to all individuals globally who use the Bolt Food Platform to request and receive an order from a diverse selection of online delivery from restaurants, stores, and pharmacies (“Partner(s)”) via the Bolt Food App. This Notice should be read in combination with all terms and conditions, guidelines and policies that apply to your use of the Bolt services as are made available for your market at <https://bolt.eu/legal>.

2. How do you contact us?

Bolt (or the relevant Bolt group company for your market - as set out [here](#) in more detail) is the data controller of your personal data processed under this Notice.

We have appointed a Global Data Protection Officer (“DPO”) and an Office of the Data Protection Officer Team. You can contact our DPO by raising a data subject rights request via the Privacy Web Form available at <https://bolt.eu/en/privacy/data-subject/> or raising any privacy-related questions in the Bolt Food App when you go to the main menu and tap ‘Support’, our Customer Support Team will then escalate the issue internally to Bolt’s Privacy Legal Team.

You can also email our Privacy Mailbox at privacy@bolt.eu - please mark the subject line of the email 'For the attention of Bolt's Data Protection Officer'.

3. What personal data do we process?

We collect and process personal data:

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

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

Personal data provided by you to Bolt

Category of personal data	Description of personal data
Profile Data	We collect personal data about you when you register to access the Bolt Food Platform and/or use the Bolt Food App including: • Full name • Email address • Phone number • Saved favorite delivery

Category of personal data	Description of personal data
	addresses (optional) • Preferences and settings related to the account, such as language preferences, communication preferences and notification settings
Payment Data	We collect details of your payment methods including payment

Category of personal data	Description of personal data
	card type, bank name, bank account number, bank account sort code, related payment verification information and transaction history on the Bolt Platform.
Identification / Verification Data	We collect / identification documents including government-issued or national identity documents (such as passports, driver's licences or national ID cards) and photographs/pictures (such as a selfie). This data is submitted by you when you

Category of personal data	Description of personal data
	are required by Bolt to verify your age and identity when ordering age-restricted goods.
Demographic Data	We collect demographic data such as your age when you are required to verify your age by Bolt.
Survey / Interview Data	We collect the content of your replies or attachments you may send us, during the course of surveys and interviews that we conduct.

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

Category of personal data	Description of personal data
Geolocation Data	We collect data about your precise and/or approximate geolocation (including GPS and IP addresses) from your mobile device depending on your app settings and device permissions, when you log in to, open, and use the Bolt Food App. You may use the Bolt Food App without enabling collection of Geolocation Data

Category of personal data	Description of personal data
	from your mobile device. This may affect some features on the Bolt Food App and you may have, for example, to enter your delivery address.
Order Data	We collect personal data via the Bolt Food App about your use of the Bolt services. This includes: • Details of orders or order history (including

Category of personal data	Description of personal data
	g date and time of the orde r, deliv ery addr esse s and geol ocati on data, detai ls of the food or other deliv ery item s orde red, your spec ial instr uctio ns or prefe renc

Category of personal data	Description of personal data
	es, the Partner's name and location, order price, currency and your delivery notes) • Loyalty card information (including whether you used any coupons, loyal

Category of personal data	Description of personal data
	ty cards or promotional codes)
App Usage Data	We collect personal data via the Bolt Food App about your use of the Bolt Food Platform. This includes: • Log-in history (dates and times you log-in and log-off the Bolt Food App); and

Category of personal data	Description of personal data
	• Interaction with the Bolt Food App (features or pages viewed or proposed to be viewed, time spent interacting with a page, browser type and other system activities)

Category of personal data	Description of personal data
	ty).
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

Category of personal data	Description of personal data
	spea k with our Cust omer Sup port agen ts; • Com muni cate with Deliv ery Part ners via the Bolt Food App usin g the in-ap p chat funct ion or via inter net calls (whe re avail

Category of personal data	Description of personal data
	able) We record the date and time of the communications and its content and your phone number (where you use the call feature). We will record calls, only where you are notified in advance that the call may be recorded. In the markets where we facilitate phone calls and text messages between Clients and Delivery Partners

Category of personal data	Description of personal data
	without sharing either party's actual phone number with the other, we protect your personal data by using a masked numbers application.
User Generated Data	We collect personal data when you use certain features. This includes: • Content like pictures, videos, files in connection

Category of personal data	Description of personal data
	with a Customer Support request. • Ratings and feedback about: • ○

Category of personal data	Description of personal data

Category of personal data	Description of personal data

Category of personal data	Description of personal data
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Category of personal data	Description of personal data

Category of personal data	Description of personal data

Category of personal data	Description of personal data

Category of personal data	Description of personal data
	• Meta data related to the method you use to communicate with Bolt. If you are ordering or paying for food at the restaurant's place (where applicable) via the Dine-in feature and you rate the food with 4 or 5 stars, you will receive a prompt message

Category of personal data	Description of personal data
	to share your feedback on Google and TripAdvisor. In this case, Bolt will not access or store the feedback you share on Google and TripAdvisor. Your review will remain exclusively with the platform you share it on.
Warning and Suspension Data	We collect details of warnings and suspensions that have been issued to a Client. This includes: • Date (s) on which

Category of personal data	Description of personal data
	h warn ings or susp ensi ons have been issu ed. • Date of expiry of a suspension. • Reason for the warning or suspension.
Device Data	We collect data about the devices you use to access the Bolt Food App, including:

Category of personal data	Description of personal data
	• Hardware model • Device IP address • Other unique device identifiers (such as your UUI D and advertising identifiers) • Device operating system • Browser version

Category of personal data	Description of personal data
	• Device vendor name • App version • Identity of carrier and manufacturer and preferred languages.
Cookies, SDKs, Analytics, and Third-Party Technology Data	We collect information through the use of cookies (to the extent you use Bolt Food website services), tracking pixels, data analytics tools,

Category of personal data	Description of personal data
	SDKs, and other third-party technologies like advertising IDs to understand how you navigate through the Bolt Food App, to make your experience safer, to improve your site and Bolt Food 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,

Category of personal data	Description of personal data
	see our Cookie Declaration .

Personal data we collect about you from other sources

Category of personal data	Description of personal data
Contact Data	We collect contact data about you: when you connect to the Bolt Food App via a third party service such as Google, Apple, or Facebook, when another Client refers you through our referral campaigns or orders the food or

	goods for you, or if you use the Bolt Food App through your employer's Bolt Business account. This includes your: • Full nam e • Email I addr ess • Pho ne num ber
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4. What purposes do we use your personal data for and what is our legal basis for processing?

The table below sets out:

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

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

- **Performance of a Contract:** When it is necessary for Bolt (or a third party) to process your personal data to provide you with the Bolt services we promised you and meet our obligations under the Terms and Conditions for Clients. Where the legal basis for processing your personal data is performance of a contract, and you choose not to provide the information, you may be unable to use the Bolt services.
- **Legitimate Interests:** When we process your personal data relying on legitimate interest

grounds. This includes our commercial and non-commercial interests in providing an innovative, personalised and safe service to you, other Clients, and other third parties (including Delivery Partners or Partners). Where the table below states that we rely on legitimate interests, we have provided a brief description of the legitimate interest. If you would like more information about this (including the balancing test), please contact us using the methods set out in Section 2 “*How do you contact us?*” above. In countries where legitimate interest is not an available lawful basis for Bolt’s processing activities, we will instead rely on an alternative valid legal basis.

- **Consent:** When we ask you to actively indicate your agreement to our use of your personal data for a certain purpose of which you have been informed of. Where we rely on consent to process your personal data, you can withdraw your consent to such activities at any time. Withdrawal of the consent does not affect the lawfulness of any processing which took place prior to you giving your consent to us.
- **Compliance with Legal Obligations:** When we must process your personal data because it is required by a law or regulation in the markets we operate in, such as to comply with our licensing conditions and our obligations under tax and accounting laws. Where the legal basis for processing your personal data is compliance with legal obligations, and you choose not to provide the information, you may be unable to use the Bolt services.
- **Vital Interests:** When we process your personal data where it is necessary to protect your vital interests or those of others, for example in the event of an emergency or an imminent threat to life.

For the provision of the Bolt services

Purpose of processing	Legal Basis	Categories of Personal Data
To create, update and maintain your Bolt account	• <i>Performance of a Contract</i>	• Profile Data • Device Data
To authenticate your account and verify your identity We collect information to verify who you say you are and in	• <i>Compliance with Legal Obligations</i> • <i>Legitimate Interests</i>	• Profile Data • Identification / Verification Data • Demographic

Purpose of processing	Legal Basis	Categories of Personal Data
certain circumstances to verify your age and eligibility for Bolt Food services (such as purchasing age-restricted items), when required by local law. If we ask you to verify your identity (either upon registration or as a result of unusual activity being detected on your Bolt Food account) and you are not able to verify, the Bolt Food services will be suspended to prevent fraud until the	ests - It is in our interest and in the interest of our Clients to prevent and address unauthorized uses of Bolt accounts and violations of our Terms and Conditions. • Con	Data • Device Data • Geolocation Data • App Usage Data • Suspension Data

Purpose of processing	Legal Basis	Categories of Personal Data
verification process is completed. As part of the verification process, you may be asked to submit a selfie and/or ID document to prove your identity. To verify your identity quickly and securely, we use facial recognition technology to confirm that your selfie shows a clear face and matches the face on your identity document. This involves processing your facial measurements. Your	<i>sent</i> - Your opt-in consent will be required in order for us to proceed with biometric verification checks.	

Purpose of processing	Legal Basis	Categories of Personal Data
biometric data may be shared with trusted verification providers to confirm your identity. If you prefer not to use facial recognition technology, you can opt for your identity to be manually verified by a member of our team, though this may take longer. You can withdraw consent at any time by contacting our Customer Support. We retain your selfie and identity document as long as		

Purpose of processing	Legal Basis	Categories of Personal Data
you have an active user account.		
To enable, improve and customise the services for the purposes of managing and delivering your order by connecting Clients with Partners and Delivery Partners We help you forward your order to the preferred Partner (i.e., restaurant, store, or pharmacy), and conclude an order preparation contract with this Partner.	• <i>Performance of a Contract</i> • <i>Consent - Your consent will be required when ordering prescription or non-prescription medical items.</i>	• Profile Data • Geolocation Data • Order Data • App Usage Data • Device Data • Payment Data • Communication Data

Purpose of processing	Legal Basis	Categories of Personal Data
Also, we find and allocate the Delivery Partner to fulfill the delivery of your order request. We obtain your consent when you order prescription or non-prescription medical items. Some of these items may reveal information about your health. Therefore, your consent is necessary for us to process the order. This enables Bolt to manage your request, coordinate with the		

Purpose of processing	Legal Basis	Categories of Personal Data
Partner, and ensure a smooth and reliable delivery. If you choose not to provide consent for processing an order containing such items, Bolt will not be able to fulfil the order. In that case, we recommend purchasing the product directly from the Partner's official website or visiting the Partner in person. We use Geolocation Data to facilitate orders and deliveries, calculate estimated time, and track the		

Purpose of processing	Legal Basis	Categories of Personal Data
progress of your orders and deliveries. We match available Delivery Partners and Partners with Clients based on their Geolocation Data to enable efficient delivery. You may use the Bolt Food App without enabling collection of Geolocation Data from your mobile devices but this can prevent you from accessing some features. Communication Data may be processed		

Purpose of processing	Legal Basis	Categories of Personal Data
if the Delivery Partners or Partners and Clients need to contact each other to coordinate order and delivery. We also help you to order food in a restaurant using the Bolt Food App, through the Dine-in feature available in certain countries. For guest users, we will only collect table number and ID, order details, address of the restaurant, email address (to the extent you choose to		

Purpose of processing	Legal Basis	Categories of Personal Data
receive a receipt or opt-in for the marketing communication), feedback shared and payment data. The data specified above is not linked to a specific user, unless you are a registered user or provide your email address.		
To make sure the Bolt Food App works optimally We use your Profile Data to notify you of updates to the Bolt Food App so you can keep using the Bolt services.	• <i>Performance of a Contract</i> • <i>Consent</i> - Your opt-in consent is required for	• Profile Data • Device data • App Usage Data • Identification / Verification data

Purpose of processing	Legal Basis	Categories of Personal Data
We also use Device Data and App Usage Data to ensure you can connect to the Bolt Food App and to help keep your account safe through authentication and verification checks.	- the use of Cookies, SDKs, Analytics, and Third-Party Technologies Data <i>Legitimate Interest</i>	Cookies, SDKs, Analytics, and Third-Party Technologies Data
To improve our websites and apps We collect and may use your App Usage Data to improve our websites and Bolt Food App (including their security features) by analysing it	<i>Legitimate Interest</i>	App Usage Data

Purpose of processing	Legal Basis	Categories of Personal Data
to better understand our business and services.		
To calculate prices and process payments We collect Payment Data to process and facilitate payment between Clients and Partners and Delivery Partners, and Geolocation Data to calculate prices based on the delivery address of the Clients taking into account distance, duration and other factors.	• <i>Performance of a Contract</i>	• Payment Data • Geolocation Data
To administer the use	• <i>Performance</i>	• Contact Data

Purpose of processing	Legal Basis	Categories of Personal Data
of and payment for the Bolt services you are offered by a Bolt Business Client or another Bolt account owner We collect your Contact Data if you use Bolt services through your employer who is a Bolt Business Client. In addition, if an organisation or another Bolt account owner has made an order for you, we will collect from them your Contact Data,	<i>of a contract</i>	• Order Data • Geolocation Data

Purpose of processing	Legal Basis	Categories of Personal Data
Order Data and Geolocation Data.		
To get your feedback on your level of satisfaction with Bolt services through surveys and interviews These surveys and interviews are designed to understand your feedback on our services, to measure customer satisfaction and enable us to take actions to improve the experience. The Survey and Interview	• <i>Consent</i> - Your opt-in consent will be required. • <i>Legitimate Interests</i> - It is in our interest and in the interest of our Clients to provide a satisfying delivery experience	• Profile Data • Demographic Data • Survey/Interview Data

Purpose of processing	Legal Basis	Categories of Personal Data
Data may be shared with research partners we use to understand your feedback.	e.	

For Customer Support

Purpose of processing	Legal Basis	Categories of Personal Data
To provide customer support services and receive and process feedback We process your personal data to investigate and address your queries including reported safety incidents/alleged criminal acts and	• <i>Performance of a Contract</i> • <i>Legitimate Interests</i> - It is in our interest and in the interest of our Clients to supp	• Profile Data • Order Data • Communication Data • User Generated Data • Suspension Data

complaints (including resolving disputes between Clients and Partners and Delivery Partners).	ort them throu ghout their use of the Bolt Food App and conti nuou sly impr ove and deve lop the cust omer supp ort we provi de. In addit ion it is in our inter est and inter est of our Clie nts and Deliv ery Part	
We also use the data you share to address quality issues and to improve our services. For safety related incidents, your Suspension Data will only be reviewed by Bolt's Customer Support and/or Safety Teams when investigatin g a safety/crim inal incident on the Bolt Platform involving you. The teams will also review the		

circumstances surrounding potential safety incidents. We may use automated processes for complaint resolution purposes via our automated chat function. For further information regarding how to object to the above activities, please see Section 9 “What are your rights?” below.	ners to address threats and abuse and promote safety, integrity and security on the Bolt Platform to ensure our services are used in accordance with the Terms and Conditions for Clients	
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	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.	
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For safety and security

Purpose of processing	Legal Basis	Categories of Personal Data
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To prevent, detect and investigate fraudulent accounts, fraudulent payments or other unlawful use of the Bolt Platform and apply suspensions and blocks as needed Our automated anti-fraud system will identify fraudulent accounts, payments, abuse of Bolt's services and other malicious activity on the Bolt Food Platform, like, for example, when you top up your balance, request multiple refunds or go through authentication	• <i>Legitimate Interests</i> - It is in our interest and in the interests of our Clients to detect, prevent and address fraud, unauthorised use of Bolt Food accounts or other harmful or illegal activity and maintain	• Profile Data • Identification / Verification Data • Device Data • Geolocation Data • App Usage Data • Payment Data • Communication Data • Order Data
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processes. To enable us to investigate, a temporary suspension may be applied to a Bolt Food account. While Bolt may use automated processes for fraud detection purposes, decisions to block a Client are taken following human review by our staff, and no account is blocked automatically without first undergoing a verification process. For further information regarding how to object to the above activities, please see Section 9 “What are	tain the safety and security of our systems, by responding to suspected or actual criminal acts. It is also in our interest and in the interests of our Clients to prevent and address violations of our	
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your rights?" below.	Terms and Conditions.	
To issue temporary suspensions In order to provide a safe and reliable marketplace, we monitor Clients' compliance with our Terms and Conditions for Clients and use App Usage Data to temporarily suspend access to the Bolt Food App: • If the Client causes any abuse or harm to the Bolt Food Platform, • If	• <i>Performance of a Contract</i> • <i>Legitimate interests</i>- It is in our interest and in the interests of our Clients and Delivery Partners to ensure a reliable and trustworthy service	• Profile Data • Suspension Data • App Usage Data

Bolt has reasonable belief of fraudulent acts by the Client when using the Bolt Food Platform, • If the Client otherwise fails to comply with his/her obligations under the General Terms, or • If the Client creat	and Platform sustainability. It is also in our interest to ensure and to enforce our services are used in accordance with the Terms and Conditions for Clients.	
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es any safet y conc erns or risks to the Deliv ery Part ners. Suspensio n or termination from the Bolt Food Platform means also suspensio n or termination from other Bolt platforms (e.g. ride-hailing platform).		
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For marketing and advertising

Purpose of processing	Legal Basis	Categories of Personal Data
To market and advertise Bolt services and those of partners	Legitimate Interests - It is in our	- Contact Data - Profile Data - Order

according to your preferences and measure the effectiveness of ads This includes using your personal data to send you targeted emails, text messages (including WhatsApp messages), push notifications, in-app messages and other communications marketing Bolt's and its partners' products, services, features, offers, promotions, sweepstakes, news and events that could be of interest. It also includes using your	interest and in the interest of our Clients to inform them about our services and features or those offered by Bolt partners. It is also in our interest to promote and advertise our services, including	Personal Data • App Usage Data • Device Data • Geolocation Data • Cookies, SDKs, Analytics, and Third-Party Technologies Data
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App Usage Data like order history, Device Data and Geolocation Data to show you targeted or personalised advertisements or personalised recommendations through the Bolt services. For example, we may display ads for Partners that are available on the Bolt Food App. We may also display ads on the Bolt Food App based on observed or inferred data such as location, interests and behaviors and ads for third party	engaging in contextual (non-data driven) and personalised advertising, analytics, and measurement of ad performance, in order to expand our user base by deepening relationships with existing Clients	
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products that are not available on our Apps. We will further display personalized ads about our products on third-party apps and collect data about your visits and actions on these third-party apps or websites. We will use pixels and similar technologies to track which emails were opened and which links were clicked by you, to help us measure the results of our campaigns and we will also use data to measure the	and developing new ones. You can opt out of these communications at any time by clicking the 'unsubscribe' link at the bottom of our emails, typing "STOP" for messages and SMS, or updating	
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effectiveness of our ads, and of third parties' displayed in the Bolt Food App or in connection with Bolt services. In addition, we will analyse, aggregate your App Usage Data and provide it to you in a summarised way each year for the wrap-up marketing campaign connected to the End of Year campaign.	your communication preferences in your account settings. • <i>Consent</i> - Your opt-in consent will be required for example, when the law requires consent for email marketing and for certain tracking	
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	tech nolo gies.	
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For service communications

Purpose of processing	Legal Basis	Categories of Personal Data
To communicate with you, including sending you service-related communications and to keep you informed Your name, phone number and email address will be used to communicate with you to send you order confirmation emails and receipts, to provide you with delivery updates, to let you	• <i>Performance of a Contract</i>	• Profile Data • Contact Data

know that your order has been completed, and to inform you about important service updates. For guest users, if you share your email address, we will use it just to send you a cost summary.		
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For research and improvement of the Bolt Food Platform

Purpose of processing	Legal Basis	Categories of Personal Data
To perform research, testing, and analytics to better understand and improve our business and services For example, we use Geolocation Data,	• <i>Legitimate Interests</i> - It is in our interest to measure the use of our services	• Geolocation Data • Order Data • App Usage Data • Communication Data • User Gen

Order Data, Communication Data and App Usage Data to conduct research to develop or improve our products, services, technology, algorithms, machine learning, and other modelling. We use Communication Data related to incidents to monitor our security practices and improve our operations and processes.	- in order to inform business decisions and to enable provision of accurate and reliable reporting and to continuously improve and develop the services we provide. • <i>Consent</i> - For certain analytics	- erated Content • Device Data
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	we may require your consent. If so, you'll be prompted to provide consent for specific purposes and processing activities, with details on how to withdraw consent, including through your profile settings.	
To	• Legit	• Profil

develop new products, features, partnerships and services	<i>imate</i> <i>e</i> <i>Interests</i> - It is in our interest and in the interest of our Clients to develop and adopt new features to improve the Bolt Platform.	e Data • Geolocation Data • App Usage Data • Communication Data • User Generated Content • Device Data
To prevent, find, and resolve software or hardware bugs and issues	• <i>Legitimate Interests</i> - It is in our interest and in the inter	• Profile Data • Geolocation Data • User Generated Content • Com

	est of our Clien ts to provi de a hass le free and relia ble servi ce.	muni catio n Data • Devi ce Data • App Usa ge Data
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For legal proceedings and compliance with the law

Purpose of processing	Legal Basis	Categories of Personal Data
To investigate and respond to claims and disputes relating to the use of Bolt services, and/or necessary for compliance with applicable legal requirements or with requests from government	Compliance with Legal Obligations - We process personal data to comply with an obligation, where	All Data

nt/law enforcement bodies Depending on the claim, All Data may be processed for establishing, exercising or defending legal claims, including: • supporting our own internal investigations ; • the assignment of claims and the use of debt collecting agencies; and • the use	n there is a request from a regulator, law enforcement or other governmental body . • <i>Legitimate Interests</i> - In the context of litigation or other disputes, it is in our interest to protect our interests	
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of legal advisors. In some circumstances, we are legally obliged to share information with external recipients. For example, under a Court Order or where we cooperate with a data protection supervisory authority in handling complaints or investigations. We also respond to requests, such as those from law enforcement agencies, when the response is required by law or furthers a public interest task such	and rights, our Clients or others, including as part of investigations, regulatory inquiries or litigation.	
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as an emergency situation or where someone's life is at risk. We will take steps to ensure that we have a lawful basis on which to share the information, and we'll make sure that we document our decision.		
To fulfill our tax obligations and comply with tax legislation	• <i>Compliance with a Legal Obligation</i>	• Profile Data • Payment Data • App Usage Data
To reorganise or make changes to our business	• <i>Legitimate Interests</i> - It is in our interest to process pers	• All Data

	onal data for orga nisat ional and busi ness plan ning purp oses .	
To ensure the security of the Bolt services (including the Bolt Platform and Bolt App) Depending on the issue, All Data may be used for technical and cyber security reasons: for example measures for combating piracy and ensuring the security of the service, website, Bolt Platform	• <i>Legitimate Interests</i> - It is in our interest and in the interest of our Clients to protect, guard and maintain Bolt's security systems, resp	• All Data

and App as well as for making and storing back-up copies and preventing/repairing technical issues.	ond to suspecte d or actual criminal acts and repair any technical issues.	
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When we process your personal data for a new purpose different from the purpose your personal data was originally collected for and we haven't asked for your consent, we will have to ensure that this new purpose is compatible with the initial purpose we collected it for. We will take into account any link between the two purposes and decide if the personal data can be used for this new purpose. Otherwise, we will take appropriate steps to ask for your consent or refrain from processing your personal data.

5. Who do we share your personal data with?

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

Category of Recipients	Description
Bolt Group Companies and partners	We may share your personal data with our Bolt Group Companies (including Bolt local subsidiaries), third party

Category of Recipients	Description
	partners, their affiliates and representatives, who may use your personal data in the manner described in this Notice. If Bolt local subsidiaries are responsible for processing your personal data, they may share your personal data with Bolt Operations OÜ as the main data controller for Bolt.
Partners	Your personal data is only disclosed to the respective Partner (i.e., restaurant,

Category of Recipients	Description
	store, or pharmacy) when you place an order in the Bolt Food App. In such a case, the Partner will see: • Your first name and the letter of the last name • Contact phone number • Your delivery address (in case the Partner uses their own deliv

Category of Recipients	Description
	ery meth od and do not lever age Deliv ery Part ners partn ering with Bolt) • Orde r Data , toget her with any infor mati on sub mitte d by you toget her with Orde r Data (for exa mple infor mati on

Category of Recipients	Description
	about food preference, cooking preferences, information about any allergies if such information is disclosed by you in the course of submitting the order) • Once the order is complete

Category of Recipients	Description
	d and to the exte nt you leav e feed back on the Part ner, we shar e it with the Part ner • After fulfilling the order, your first name and the telephone number will remain visible to

Category of Recipients	Description
	the Partner for 24-48 hours. This is necessary to resolve any issues with you regarding your order, such as issuing an electronic receipt for your order, or contacting you about

Category of Recipients	Description
	availability of items you ordered. Clients may also opt-in to share their contact and order details with a specific Partner to receive marketing communications from such Partners. To the extent you use Dine-in service as the registered user, your personal data will be shared with the restaurant such as your table number and ID, your order details, your status

Category of Recipients	Description
	of payment and any feedback you submit to rate the food and service.
Delivery Partners	Your delivery address, first name and the letter of the last name and contact phone number (to the extent the Delivery Partner reaches out to you using the Bolt Food App button "Call" during the active order) will be shared for the order delivery with the Delivery Partner. After fulfilling the order, your first name and the

Category of Recipients	Description
	telephone number is not visible to the Delivery Partner.
Bolt Business Clients or other Clients	Some orders you take may be requested or paid for by others. If you take one of those orders using the Bolt Business Profile account of your employer, a code or coupon, a corporate credit card linked to another account, or another user or entity otherwise requests or pays an order for you, we may share Order Data and your Contact

Category of Recipients	Description
	Data with that other party. The data shared with Bolt Business Clients will be disclosed via reports they can access on their Business Accounts. In addition, we share this data so you can expense your orders to the Bolt Business Profile Account. Processing of personal data will occur under the same conditions as established in this Notice.
Promotional, marketing and strategic	We may share limited data like your email

Category of Recipients	Description
partners	address with our promotional, marketing and strategic partners so that they can inform you about promotional events and provide you with information and marketing messages about products or services that may interest you. In addition, we may share your personal data with marketing platform providers, including social media advertising services, advertising networks, third-party data

Category of Recipients	Description
	providers, to reach or better understand our users and measure the effectiveness of our ads on other platforms and with social media platforms, including Facebook and Google, for sign-in purposes.
Third-party service providers	Our third-party vendors and other service providers and contractors have access to your personal data to help carry out the services they are performing for us or on behalf

Category of Recipients	Description
	of us. This may include vendors and providers who provide email or moreover electronic communication services, tax, legal and accounting services, product fulfilment, identity/verification processes, payment processing, customer support, fraud prevention and detection, data enhancement, web hosting and cloud storage, research, including surveys, analytics, crash reporting,

Category of Recipients	Description
	performance monitoring and artificial intelligence, machine learning and statistical services. In addition, we will share data like your geolocation with Google in connection with the use of Google maps in our apps.
Other third parties	In the event of a likely change of control of the business (or a part of the business) such as negotiations for a sale, an actual sell, a merger, and acquisition, or any

Category of Recipients	Description
	transaction, or reorganisation, we may share your personal data with interested parties, including as part of any due diligence process with new or prospective business owners and their respective professional advisers. We may also need to transfer your personal data to that third party or re-organised entity after the sale or reorganisation for them to use for the same purposes

Category of Recipients	Description
	as set out in this Notice.
Law Enforcement	We may disclose information under a court order or where we cooperate with a data protection supervisory authority in handling complaints or investigations. For example, we may also share your personal data with law enforcement or other public authorities, including responding to requests when the information is required by law or furthers a public interest task. In any

Category of Recipients	Description
	scenario, we will take steps to ensure that we have a lawful basis on which to share the information, and we'll make sure that we document our decision.

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

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

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

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

- Adequacy Decisions:** We will rely on decisions from the European Commission where they recognise that certain countries and territories outside of the European Economic Area ensure an adequate level of protection for personal information. Please click [here](#) to see the list of countries deemed 'adequate' by the European Commission and click [here](#) to see the list of countries deemed 'adequate' by the UK Government. We rely on these adequacy decisions when we transfer personal data we collect from the EEA and the United Kingdom to the United States (where some of our third party service providers are

based).

- **Standard Contractual Clauses (SCCs):** We will utilise standard contractual clauses approved by the European Commission for transfers outside the EEA and by the UK Government for transfers outside of the United Kingdom. Please click [here](#) to see the EEA SCCs and click [here](#) to see the UK SCCs. We will rely on SCCs when we transfer personal data we collect from the EEA and the United Kingdom to the United States, Singapore and Nigeria where some of our third party service providers are based.

There may be certain situations (such as responding to law enforcement requests - see Section 4 “*What purposes do we use your personal data for and what is our legal basis for processing?*” above) where a transfer of personal data will take place on the basis of exemptions provided for under applicable data protection legislation. In these circumstances, we will take steps to minimise and protect the personal data transferred.

7. How do we keep your personal data safe?

The security of your personal data is very important to us, and we have implemented appropriate technical and organisational controls to protect your personal data against unauthorised processing and against accidental loss, damage or destruction. We have implemented data encryption in transit and at rest, data privacy and security training, information security policies and controls around the confidentiality, integrity and availability of our data/systems.

Any personal data collected in the course of providing Bolt services is transferred to and stored in our data centres which are located within the EEA. Only authorised employees of Bolt Group companies and partners have access to the personal data and they may access the data only for the purpose of resolving issues associated with the use of the services (including disputes regarding delivery services and customer support services in the respective countries <https://bolt.eu/cities/>).

For our research and scientific purposes, all data, like bulk Geolocation Data, is anonymised so you can never be identified from it. Regarding anonymised data, we will not attempt to re-identify your personal data that has been deidentified, in the course of sharing your data with other organisations.

You are responsible though for choosing a secure password when we ask you to set up a password to access parts of our sites or apps. You should keep this password confidential and you should choose a password that you do not use on any other site.

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

We keep your personal data only as long as necessary to provide you with our services and for the purposes described above in Section 4 “*What purposes do we use your personal data for and what is our legal basis for processing?*”.

This means that the retention periods will vary according to the type, the amount and sensitivity of your personal data, the potential risk of harm from unauthorised use or disclosure of your

personal data and the reason that we have collected the personal data in the first place. Here are the key criteria we use for determining our retention periods:

Retention Periods Criteria	Description
Personal data retained until you remove/delete it	It's your right to request that we delete certain of your personal data. See Section 9 " <i>What are your rights?</i> " below for more information.
Personal data that expires after a specific period of time	We have set certain retention periods so that some data is not retained after a specific period of time. See table below for further details. After a retention period has lapsed, the personal data is securely deleted, unless it is necessary

Retention Periods Criteria	Description
	for the establishment, exercise or defence of legal claims.
Personal data retained until your Bolt Food Account is deleted	We keep your data until your Bolt account is deleted unless further retention of certain personal data are required for the purposes described in the second table below.

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

Category of Retention Periods	Description
Tax, accounting and financial reporting purposes	We retain your financial data for up to 10 years after the last order if your personal data is necessary

Category of Retention Periods	Description
	for tax, accounting and financial reporting purposes.
Provision of services purposes	We retain your data as long as you have an active account. If your account is deleted, personal data will be deleted (according to our retention schedule and rules), unless such data is still required to meet any legal obligation, or for accounting, dispute resolution or fraud prevention purposes. You may request deletion of your account at any time

Category of Retention Periods	Description
	through the Bolt Food App. See Section 9 “What are your rights?” below for more information.
Formal investigations of a criminal offence, fraud or false information	We retain data for as long as necessary for the purposes of investigating and detecting fraudulent, criminal or unlawful activities, or false information having been provided.
Disputes	We retain data for the purpose of exercising or defending legal claims, including supporting our own

Category of Retention Periods	Description
	internal investigations, including claims related to the unlawful processing or collection of user's consent, until the claim is satisfied or the expiry date of such claims.
Instant Messages	We retain data about instant messages between you and the Customer Support Team directly in the Bolt Food App for 60 days from the last communication and in Bolt's databases for 3 years from the last communic

Category of Retention Periods	Description
	ation. Instant messages between Clients and Delivery Partners are kept in the Bolt Food App only until the order is completed and for 30 days after in our systems.
Customer Support	We retain data in relation to support tickets submitted via instant messages, phone calls, web forms, and emails for 3 years from the last communication.

Please note that the deinstallation of Bolt App in your device does not cause the deletion of your personal data. See Section 9 “*What are your rights?*” to exercise your Right of Erasure.

9. What are your rights?

As a data subject you have following rights:

- **Access your personal data (known as “Right of Access”):** You have the right to access and to request copies of your personal data by contacting our Customer Support

Team.

- **Update/correct your personal data (known as “Right of Rectification”):** You have the right to request us to correct personal data that is inaccurate or incomplete. You can change and correct certain personal data yourself within the Bolt App or by contacting our Customer Support Team.
- **Delete your personal data (known as “Right of Erasure”):** You have the right to request that we erase your personal data, under certain conditions (e.g., we are processing your personal data under your consent). Personal data that is processed pursuant to a legal obligation or where we have an overriding legitimate interest may not be deleted upon request. You can request erasure of your personal data by contacting our Customer Support Team.
- **Restrict use of your personal data (known as “Right to Restrict Processing”):** You have the right to request that we restrict the processing of your personal data, under certain conditions (e.g., we are processing your personal data under consent). You can request restriction of the use of your personal data by contacting our Customer Support Team.
- **Object to use of your personal data (known as “Right to Object”):** You have the right to object to our processing of your personal data, under certain conditions (e.g., we are processing your personal data under legitimate interests). You may submit an objection to the use of your personal data by contacting our Customer Support Team.
- **Object to solely automated decisions being made about you which has legal or similarly significant effect on you (known as “Right to object to automated decision making”)** - You have the right, under certain circumstances, to object to any solely automated decisions we have made which have a legal effect or similarly significant effect which does not involve human review. You can ask that a person review the decision, obtain an explanation of the decision reached after such assessment and challenge the decision by contacting our Customer Support Team. Please note that certain exceptions and limitations may apply to your right to object to automated decision-making, as permitted by applicable laws and regulations. We will provide you with clear information regarding the implications of exercising your rights and the processes involved in objecting to solely automated decision-making.
- **Port your personal data (known as “Right to Data Portability”):** You have the right to request that we transfer the personal data that you have given us to another organisation, or directly to you, under certain conditions. This only applies to information you have given us. You can request for your personal data to be ported by contacting our Customer Support Team.
- **Withdraw your consent:** If we process your personal data using consent as legal basis, then you have the right to withdraw your consent at any time (e.g., by unsubscribing from marketing communications or by updating your communication preferences in the Bolt App). Withdrawing your consent won't change the legality of processing undertaken by Bolt before you withdraw your consent.
- **File a complaint:** If you have any concerns regarding the processing of your personal data, you have the right to lodge a complaint with the [Estonian Data Protection Inspectorate \(“AKI”\)](#) who is our lead supervisory authority or your local data protection authority. You may also have a right to seek a judicial remedy.

To exercise any of the above rights, you can [contact us](#) via the Privacy Web Form available at <https://bolt.eu/en/privacy/data-subject/> or in the Bolt Food App when you go to the main menu and tap ‘Support’, the Customer Support Team will then forward the issue internally to Bolt’s

Privacy Legal Team.

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 by navigating to the main menu, tapping 'My Account' and 'Communication Preferences'.

If you experience issues with changing your communication preferences, you can [contact us](#) via the Web Form available at <https://bolt.eu/en/privacy/data-subject/> or the Bolt Food App and choose the reason for contacting us '*I want to unsubscribe from emails and SMS*'.

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 Food App).

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

We may make changes to this Notice from time to time. If we make significant changes, we will notify you (as required) via the Bolt Food App, website or via another method such as email.