



PRIVACY NOTICE

Thank you for choosing to be part of our community at Freebike s.r.o., providing electric bike sharing as Freebike ("Freebike", "freebike", "we", "us", or "our"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at info@freebike.com.

When you visit our website www.freebike.com, mobile application, and use our services, you trust us with your personal information. We take your privacy very seriously. In our privacy policy we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We believe you take the time to read through it carefully, as it is important.

This privacy policy applies to all information collected through our website (such as prague.freebike.com or freebike.com), mobile application, ("**App**"), and/or any related services, marketing or events ("**Sites**").

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

***In Short:** We collect personal information that you provide to us such as name, address, contact information, passwords and security data, and payment information.*

We collect personal information that you voluntarily provide to us when registering at the Sites or Apps, expressing an interest to use our electric bikesharing scheme or obtain information about us or our products and services, when participating in activities on the Sites or Apps or otherwise contacting us.

Monitoring or recording of your calls or e-mails may take place for our business purposes

The personal information that we collect depends on the context of your interactions with us and the Sites or Apps, the choices you make and the products and features you use. The personal information we collect can include the following:

Name and Contact Data. We collect your first and last name, email address, postal address, phone number, demographic information, location information and other similar contact data.

Credentials. We collect passwords, password hints, and similar security information used for authentication and account access.

Payment Data. We collect data necessary to process your payment if you make purchases, such as your payment instrument number (such as a credit card number), the security code associated with your payment instrument, billing and contact information. All payment data is stored by our payment processor and you should review its privacy policies and contact the payment processor directly to respond to your questions.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

Information collected through our Apps

***In Short:** We may collect information connected to your geo-location and your mobile device, when you use our app or our bikesharing scheme.*

If you use our Apps, we may collect the following information:

- **Geo-Location Information.** We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using our mobile application, to provide location-based services. We collect information about the location of the rented bikes and their routes, incl. the status of the bikes. If you wish to change our access or

permissions, you may do so in your device's settings.

- **Mobile Device Access.** We may request access or permission to certain features from your mobile device, including your
- **Mobile Device Access.** We may request access or permission to certain features from your mobile device, including your mobile device's bluetooth, camera, sensors, and other features. If you wish to change our access or permissions, you may do so in your device's settings.

Information collected from other sources

In Short: We may collect limited data from public databases, marketing partners, and other outside sources.

We may obtain information about you from other sources, such as public databases, joint marketing partners, as well as from other third parties. Examples of the information we receive from other sources include: social media profile information; marketing leads and search results and links, including paid listings (such as sponsored links).

2. HOW DO WE USE YOUR INFORMATION?

In Short: We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Sites or Apps for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, freebike service ("Business Purposes"), in order to enter into or perform a contract with you ("Contractual"), with your consent ("Consent"), and/or for compliance with our legal obligations ("Legal Reasons"). We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To provide you with our services,** especially to register, execute payment procedure, manage your account and interact with you through the App, website, email or SMS and meet our commitments related to our service standards and our Terms and conditions.
- **To send you marketing and promotional communications.** We may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time (see the "[WHAT ARE YOUR PRIVACY RIGHTS](#)" below).
- **To send administrative information to you.** We may use your personal information to send you service and new feature information and information about changes to our terms, conditions, and policies.
- **Fulfill and manage your orders.** We may use your information to fulfill and manage your freebike usage, payments, returns, and exchanges made through the Apps or website.
- **Request Feedback.** We may use your information to request feedback and to contact you

about your use of our Sites or Apps.

- **To enforce our terms, conditions and policies.**
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **For other Business Purposes.** We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Sites or Apps, products, services, marketing and your experience. We may also use information for quality control and training, to prevent unauthorised use of our system and to ensure effective systems operation and in order to prevent or detect crime.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: We only share information with your consent, to comply with laws, to protect your rights, or to fulfill business obligations.

We may process or share data based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party service providers or contractors who perform services for us or on our behalf and require access to such information to do that work. Examples include payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Sites or Apps, which will enable them to collect data about how you interact with the Sites or Apps over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their

promotional purposes.

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- **Business Partners.** We may share your information with our business partners to offer you certain products, services or promotions.

4. WHO WILL YOUR INFORMATION BE SHARED WITH?

In Short: We only share information with the following third parties.

We only share and disclose your information with the following third parties. We have categorized each party so that you may be easily understand the purpose of our data collection and processing practices. If we have processed your data based on your consent and you wish to revoke your consent, please contact us.

- **Web and Mobile Analytics**
Google Analytics
- **Payments**
Braintree

5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. We also use Google analytics, service provided by Google, it's usage may collect information as IP address, time of visit, location and repeated visit. Google Analytics is a subject to Google's privacy policy. We use such technologies to monitor traffic, improve our web, apps and other services.

6. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than 6 months past the termination of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

7. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. We will do our best to protect your personal information, transmission of personal information to and from our Sites or Apps is at your own risk. You should only access the services within a secure environment.

8. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the [contact details](#) provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log into your account settings and update your user account.
- Contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms and conditions and comply with legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If

you choose to remove cookies or reject cookies, this could affect certain features or services of our Sites or Apps. To opt-out of interest-based advertising by advertisers on our Sites or Apps visit <http://www.aboutads.info/choices/>.

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we will still need to send you service-related emails that are necessary for the administration and use of your account. To otherwise opt-out, you may contact us using the contact information provided.

9. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

10. MINORS PERSONAL INFORMATION

Freebike is providing service to users at the age of 18 and older. If it used by minors, under the responsibility of a registered adult only. We do not collect or use any personal data about minors.

11. DO WE MAKE UPDATES TO THIS POLICY?

In Short: Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

12. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this policy, you may contact our Data Protection Officer (DPO), Monika Degroux by email at info@freebike.com or by post to:

Freebike s.r.o.,
Krizikova 237 36A,
186 00 Prague 8,
CZ
