

PRIVACY POLICY

1. Your privacy is our priority

We are fully aware of how important your privacy is and therefore we take the current regulations on data protection very seriously. Our main objective is to ensure that you have a safe and easy online experience when using our service because we are convinced that our success is based on the transparency and trust we have with our users.

Therefore, we want to give you a complete overview of our practices when processing and protecting your personal data, so that you are correctly informed and can be in control of your data at all times. As a user of our service, we want you to know how we collect, store and process your personal data.

We have created this privacy policy (hereinafter, “**Privacy Policy**”) so that you have all the necessary information. We invite you to read it carefully and if you have any questions, please do not hesitate to contact us. You can also send all your comments and/or questions related to your personal data and how we use it to: privacy@rideyego.com. We will respond to you as quickly as possible.

2. Who is responsible for data processing?

The electric vehicle rental service (hereinafter, the “**Service**” or “**Services**”) is provided:

- (i) In Spain, by **YEGO URBAN MOBILITY, SL**, a company under Spanish law with a registered office at Calle Ávila 138, 4º 2ª, 08018, Barcelona (Spain), and provided with NIF B-66.785.767.
- (ii) In France (Paris) by **YEGO URBAN MOBILITY FRANCE, SAS**, Société par actions simplifiée à associé unique - Share capital of 3,000.00 euros - Registered office at 122, rue Amelot, 75011 Paris - 878 307 248 RCS. Paris- Intra-community VAT number FR79878307248.

Both companies are part of the same business group, the second being a 100% subsidiary of the first. (hereinafter, “**YEGO**” or “**we/our**”).

For the provision of the Service, YEGO gives access to its users (hereinafter, jointly called the “**Users**” or individually the “**User**”) to a downloadable application on their mobile devices that allows the User to rent an electric vehicle, including motorcycles, bicycles and scooters. This is according to locally applicable regulations, provided by YEGO, for the realization of a journey within a certain city and the locations within it, calculating the price of the Service per minute or by applying packs or subscription plans.

This Service is accessible through a mobile application called “YEGO” (hereinafter, “**App**”), and the App can be downloaded from our website through the following URL: www.rideyego.com (hereinafter the “**Website**”) in which we also describe our Services. Both the Website and the App may henceforth be referred to indistinctly or jointly as the “**Platform**”.

As the owner of the Platform, the **Data Controller is YEGO URBAN MOBILITY, SL, a company under Spanish law with a registered office at Calle Ávila 138, 4º 2ª, 08018, Barcelona (Spain), and provided with NIF B-66.785.767.** and YEGO URBAN MOBILITY FRANCE, SAS, acts as the Data Processor within the framework of the provision of the Services in France.

The personal data of each User who uses the YEGO Service will be treated as indicated in this Privacy Policy.

Services are extensively described in the [YEGO Terms and Conditions](#).

YEGO is responsible for the processing of your personal data that is collected due to your use of the Service and the Platform according to your country of registration. This means that YEGO is the Data Controller and is in charge of its collection, its security and its processing for the purposes detailed by YEGO in this Privacy Policy in accordance with data protection regulations. At the time of registration as a User, you accept said processing of your data and guarantee the veracity of the data provided.

3. Data collected

3.1 What is Personal Data?

In accordance with the applicable regulations on the matter, “**Personal Data**” is all information about an identified or identifiable natural person, such as a name or an identification number.

3.2 What Personal Data does YEGO use?

YEGO collects and processes different Personal Data to provide you with the Service and improve your experience on the Website and in the App, either because you are a User, or because you contact us. Improving your experience means that you can enjoy the Platform, that you have direct access to information that may be of interest to you, and that you can manage your privacy preferences.

3.2.1 Personal Data or information that as a User you provide us with directly:

- Registration data. During registration as a User we collect the following Personal Data: Name, surname, e-mail, address, telephone, ID or passport or a similar document that identifies you, gender, date of birth (therefore, age), photography, and driving license.
- User profile information. The information that you add to the Platform as a User for the purposes of using the Service offered by YEGO. You can view and edit the Personal Data of your profile at any time. You should know that YEGO does not store credit/debit card data through which payment for each YEGO Service will be processed. The credit/debit card data is provided to duly approved electronic payment service providers who receive and store the data to manage the payment on behalf of YEGO without the data being on YEGO's servers and systems. Specifically, the provider *Stripe*, in our case, provides this service safely and applies the appropriate security, technical and organizational measures, as well as the encryption of data, where appropriate. YEGO only has access to the payment method information, which allows it to make direct debits.
- Additional information that you wish to share as a User. Information that you can share for other purposes such as profile photos or billing information if you request it, or information you share by answering questionnaires, surveys, quizzes or the like provided by YEGO whether to give your opinion on the Service or for other purposes (opinions on the sector, your transport needs, your knowledge of the traffic rules, etc.).
- Information included in, or about, communications, claims, complaints and/or comments made to YEGO. YEGO will have access to the Personal Data and to the information that you provide for the resolving of questions, request for information, complaints, suggestions or comments either through the channels established for this purpose, by email or through the chat or telephone customer service offered by YEGO and/or by the *Intercom* provider with which YEGO collaborates.
- Comments on our social networks and website reviewing the Service or YEGO in general.

- Information on accidents, theft, acts of vandalism against YEGO assets and other events that involve the parties involved in providing the Service through the App, for the presentation of claims or other actions with the insurance companies contracted by YEGO, as well as with the competent public authorities or bodies.

3.2.2 Personal Data or information that as a User you provide us with indirectly:

- Personal Data derived from the use of the Platform, provision of the Service, including the rented vehicles themselves. Each vehicle has built-in software that collects and sends information. YEGO collects data during the use of the Service or the App by the User such as the date, time and place of the start and end of the rental, route, the information provided by the rented vehicle itself and through sensors (battery status, if it is on or off, etc.) and geolocation systems.
- Data from the App and the mobile device with which you interact with us as a User. YEGO collects data related to the IP of the User's device, phone brand, operating system version, internet connection and time zone.
- Data derived from the origin of the User. In the event that, as a User, you arrive at the YEGO Platform through an external source, such as a link from another website or a social network, or through Google. This data can be directly controlled by you as a User through the external source through which you are redirected to the YEGO Platform. Consult the privacy policy of the external sources through which you browse.
- Data on Geolocation. Whenever you authorize it as User, YEGO will collect data related to the location of your device, including its geographical location in real time, as it is necessary for the provision of the Service. Some features will allow you to share this information with the person of your choice, thus making you responsible for the transfer of your own data to a third party.
- Data derived from the use of Cookies. YEGO uses third-party Cookies to facilitate User navigation and for statistical purposes on its website. This Personal Data is not collected with the use of the App. You can consult the [Cookies Policy](#) for more information.

4. Why do we process your personal data?

4.1 So that you can use the YEGO Platform and we can manage the provision of the rental Services that you request.

YEGO uses the Personal Data that it collects from Users to manage access and communication with the Platform, as well as to provide the Services that are requested by the User through their registered account, in terms of vehicle rental and providing all the necessary tools for the effective enjoyment of the Service.

4.2 To comply with the legal, accounting, tax, administrative and contractual obligations related to the provision of the Services requested by the User, including processing payment for the Service through the secure payment gateway offered by an external provider.

4.3 Communications.

YEGO uses the Personal Data of Users to carry out communications about the operation of the Service by any means (email, phone calls, messaging or chat, automated communications without human intervention, push notifications which consist of sending messages to a mobile phone, or any type of similar communication).

We can send messages to your mobile phone with information regarding the status of your Service request, as well as provide you with a summary/receipt about the use of the Service and its price.

4.4 The promotion and realization of commercial offers and surveys, in both online and offline environments about the Services marketed by YEGO.

YEGO may send you commercial communications by email, push notifications, which consist of sending promotional messages to a mobile phone, or by any type of similar communication in both online and offline environments about YEGO Services according to the preferences of the User and the contracted Services, or on applicable rules of the Traffic Rules or similar.

You can unsubscribe from commercial communications by withdrawing your consent in the function enabled in each one for this purpose. Likewise, you can manage your communications and privacy preferences directly through the Platform.

There may be data processors who provide YEGO with the services of sending and managing commercial communications with whom the due data processor contract will be signed, limiting data processing to the fulfilment of specific purposes.

4.5 To prepare measures aimed at protecting credit rights, including activities aimed at identifying the User of the Service and being able to generate exclusion lists to the Service for those Users who have carried out some type of verified fraud on the Platform.

4.6 To resolve claims, complaints, incidents and/or queries.

The information may be processed to resolve claims, complaints, incidents and/or queries both at the request of Users and ex officio by YEGO.

4.7 To detect and investigate fraud and possible perpetration of crimes, as well as possible matters related to road safety and traffic compliance.

YEGO may process the information for the purpose of detecting and investigating fraud, and for the investigation of possible issues related to road safety and regulatory compliance as well as the possible perpetration of alleged crimes. In this sense, we may request information from you in order to comply with legal obligations to pursue conduct that may be contrary to applicable regulations.

4.8 Statistical purposes and analysis of the Service.

The information may be used to analyze the behaviour and preferences of Users and to be able to offer the best possible experience in the use of the Platform and so that you can easily and intuitively access the Services as well as the management of your privacy.

4.9 To process incidents and claims with insurers.

YEGO may process the User's data to report any damage or unforeseen events that may be covered by the insurance policy or policies taken out by YEGO.

Your Personal Data may be processed when you are running the Platform both in the foreground and in the background.

5. What is the authentication of data processing?

The processing of your Personal Data as a User is carried out based on the following legal bases of authentication in accordance with the applicable regulations:

- The execution of the contractual relationship that, as a User, binds you to YEGO once you have registered on the Platform. Until you register as a User, we will process your Personal Data for the application of pre-contractual measures at your request when browsing the Website or downloading the App. The contractual relationship will remain until you unsubscribe from the Platform yourself, or request it directly from us. In the event that you have not requested the provision of a YEGO Service

for a prolonged period, we will send you a written notification to ask you if you want to unsubscribe from the Platform unless you have previously prohibited us from contacting you in this way. In any case, you will have to request your withdrawal from the Platform to end the contractual relationship.

- On the basis of our legitimate interest, such as carrying out controls to prevent fraud through the Platform.
- The compliance with legal obligations that are imposed on us, for example when judges, courts or relevant authorities request specific Personal Data from us as part of investigations.
- Based on your explicit consent to send you commercial communications and surveys, unless you have indicated otherwise.

6. WHO ARE THE RECIPIENTS OF PERSONAL DATA?

YEGO does not transfer your Personal Data to third parties or make international transfers. Under no circumstances do we sell your Personal Data, so you will always have control of it.

However, we can communicate some specific data to our contractual providers with whom we guarantee that we have signed binding contractual commitments to comply with the regulations on data protection for the communication of Personal Data between the data controller and the data processor.

The possible recipients of your Personal Data are:

- Service providers. YEGO may subcontract the provision of certain services, so there may be entities with access to certain data for the exclusive realisation of the provision subcontracted by YEGO.
- Payment service providers. When you enter your credit/debit card data through the YEGO Platform, your data is stored directly on payment platforms contracted by YEGO. The providers of these services are selected for complying with the standards of security measures according to the standards of the Payment Card Industry Security Standards Council (PCI SSC). YEGO does not store this data under any circumstances.
- Customer service and incident management. YEGO may communicate your data to companies that provide customer service, as well as those that conduct activities aimed at measuring the degree of satisfaction of Users, as organize a survey, and the provision of the Service with a prior written agreement with those companies.
- YEGO Group companies. YEGO may communicate your data to other companies of the YEGO group, including subsidiaries, as well as to YEGO franchisees for the fulfilment of the contractual obligations derived from the use of the Platform and the provision of the Services.
- Computer system services. YEGO may contract IT services for the management and maintenance of YEGO's own systems, so these entities may have additional access to data owned by YEGO.
- Insurance companies. YEGO may communicate data to insurance companies, as well as insurance brokers with which YEGO has a contractual relationship for the processing, management and monitoring of claims and incidences arising from the activity of YEGO and its collaborators.

We will not transmit your data to third parties unless (i) it is necessary for the provision of the contracted Services, (ii) as a User you have given us your explicit consent, (iii) when requested by a competent authority in the exercise of its functions conferred by law or (iv) if required by law.

7. HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

YEGO will keep your Personal Data for the duration of the execution and maintenance of the contractual relationship, that is, as long as you continue to be a User of the YEGO Platform.

Once you terminate the Platform and cease to be a User, YEGO will keep your Personal Data until the end of the statutory limitation periods in particular contractual and tax matters.

Personal Data will be duly blocked in accordance with applicable regulations, with YEGO adopting all technical and organizational measures to prevent its processing except for making Personal Data available to judges and courts, the Public Prosecution Service and relevant public administrations, particularly the data protection authorities, as well as insurers in the event of claims, and for the requirement of possible responsibilities derived from your relationship as a YEGO User.

You can request more information about the retention periods of your data by sending an email to privacy@rideyego.com.

8. International data transfers

The data that we collect from you is not processed or stored outside the European Economic Area (EEA).

If Personal Data is transferred outside the EEA to third parties or service providers, we will take steps to ensure that it receives the same level of protection as if it had remained within the EEA by undertaking the necessary safeguards and guarantees to preserve your privacy in accordance with the provisions of the GDPR. YEGO will only transfer data internationally on the basis of the Standard Contractual Clauses approved by the European Commission which may be updated or revised, as well as other equally valid transfer mechanisms such as adequacy decisions, where applicable, Binding Corporate Rules or Agreements approved by the European Data Protection Authorities.

You may request further information about international data transfers or the secure transfer mechanisms under which your Personal Data may be communicated outside the EEA by sending an email to: privacy@rideyego.com.

9. How is our exclusion list managed?

To guarantee the security and reliability of the operations carried out by the Services offered on our Website and our App, YEGO has created an exclusion list of Users in case of fraud, verified and tested by our team. If you register and you are on this list, the User profile will be blocked and you will not be allowed to use the Services offered by YEGO.

YEGO maintains the Personal Data of Users related to fraudulent activities for security reasons based on our legitimate interest.

10. What are your rights?

As a User, you can exercise the following rights related to your Personal Data:

Rights	Description
Right of access	You have the right to obtain a copy of your Personal Data which is the object of processing, as well as certain details about the way in which we use it. We may ask you, before providing the information, to specify the Personal Data or data processing activities to which your request refers.
Right of rectification	We take all appropriate measures so that the stored data is accurate and complete. However, if you consider that this is not the case, you can request an update or correction. When necessary, it must be accompanied by supporting documentation of the inaccuracy or incompleteness of your Personal Data.
Right of erasure	You will have the right to request the deletion of your Personal Data. Keep in mind that exercising the right of erasure may make it impossible to provide you with the Service.
Right to limitation of data processing	You will have the right to request the limitation of data processing, with your Personal Data only being processed for the exercise of the aforementioned rights, as well as for the defence of possible claims. Keep in mind that exercising the right to limitation may make it impossible to provide you with the Service.
Right to object	You have the right to object to data processing, at any time, for reasons related to your particular situation, in the event that processing is based on our legitimate interest or the legitimate interest of a third party. In this case, we will put an end to the data processing that you indicate to us, unless we accredit legitimate reasons to continue with it. Keep in mind that exercising the right to object may make it impossible to provide you with the Service.
Right to portability	You have the right to request your Personal Data in a structured, commonly used and machine-readable format and for it to be transmitted to another third party of your choice.
Right not to be the subject of automated decisions, including profiling	You have the right not to be the subject of automated individual decisions. Some of YEGO's decisions, including the application of tailored features via the YEGO App, are applied automatically based on the personal data associated with the User's account.
Right to revoke consent	You have the right to withdraw your consent at any time with respect to data processing which you have authorized previously.

To exercise any of these rights, you can contact us at any time through the App chat or through the email privacy@rideyego.com. You will need to attach a copy of your national identity document, passport or another valid document that identifies you, clearly indicating what right you exercise and which specific processing of data it is regarding.

Likewise, we inform you that if you do not see your expectations met, you can contact the relevant control authority, in this case, the Spanish Agency for Data Protection.

If you want to receive more information, do not hesitate to contact us.

11. What safety measures do we apply to data processing?

Your Personal Data is important to YEGO. We employ efficient technical and organizational measures to protect your Personal Data. We undertake to process your Personal Data in accordance with the provisions of applicable regulations and, in particular, to (i) process the Personal Data to which we have access, with sufficient guarantees of confidentiality; and (ii) adopt the technical and organizational security measures necessary to prevent the alteration, loss and unauthorized processing of or access to your Personal Data.

YEGO will store your Personal Data on servers located in France and managed by OVH SAS, which is part of the CISPE association (*Cloud Infrastructure Service Provider in Europe*) which promotes the correct application of applicable regulations on Data Protection. We also store Users' Personal Data encrypted in a data centre located in Paris (France) at Amazon Web Services Inc., which also applies privacy protocols for the secure transfer of data between the member states of the European Union and the United States of America.

Access to your YEGO account is only possible after entering your personal password. For this reason, we recommend that you always treat your account access information with confidentiality and that you close the browser window or the session once you have finished communicating with us, particularly if you use a shared computer and/or other shared devices.

12. Can we change the privacy policy?

Due to the continuous evolution of YEGO's activities as well as due to new regulations or guidelines regarding security and data protection, YEGO may modify this Privacy Policy and the Cookies Policy. If there is any change, you will be notified once you start a session or access the Platform either via the Website or via the App. Under no circumstances will the changes imply a loss of effectiveness in the protection of your Personal Data.

In case of discrepancy between translated versions and the Spanish version of this text, the latter will take precedence.

13. Contact us

If you have any questions about your Personal Data, you can contact us at the following address:

YEGO URBAN MOBILITY, S.L.
Calle Ávila 138, 4º 2ª,
08018, Barcelona, Spain
privacy@rideyego.com