## PRIVACY POLICY from 01.01.2023

In this document (the Privacy Policy) we explain how we process your personal data that we collect at City Bike TLN App. Please read this Privacy Policy carefully.

- 1. City Bike OÜ manages website www.citybike.ee and mobile application City Bike TLN App, which enables the use of Bike Rental System (hereafter referred to as the Service). We process personal data in accordance with the privacy policy of the City Bike OÜ. Additional information about the processing of personal data regarding the Service is provided hereunder.
- 2. Personal data processed in provision of Service:
- 2.1. first name and surname;
- 2.2. contact details (telephone number, e-mail address);
- 2.3. age;
- 2.4. payment information, including credit card details and/or personal identification code;
- 2.5. ride information, including time and location of renting and returning bike and route.
- 3. Legal basis and purposes of processing personal data The legal basis for the processing of personal data is the performance of the Service agreement entered into with the user. The purposes of processing personal data are as follows:
- 3.1 In order to use the Service a user account must be created, via which it is possible to accept Service terms of use and to choose a suitable payment method for paying for the service.
- 3.2 The contact details submitted when creating the user account shall only be used to communicate information and notices related to the Service and to process claims related to use of the Service.
- 3.3 Payment and travel information is processed to enable payment for the Service according to the choice of the user and the duration of the journey.
- 3.4 The bicycles are equipped with a GPS device to determine their location. This makes it possible to display to users' individual route information, to notify users when they cross the city's borders, to provide assistance (e.g. in the event of technical problems) and to identify potential violations of the Service agreement (e.g. bicycle theft).
- 4. Access to user account, personal data and the rectification of personal data
- 4.1 The user must set a user account password when creating the user account. There are minimum requirements for password selection.
- 4.2 The user has access to their personal data when logging in to their user account and can update or correct the personal data submitted by them at any time.
- 5. Processors The processors of personal data are cooperation partners, who may only process personal data to the extent necessary for the performance of the contract entered with them. Regarding the provision of the Service, the authorised processors are the development, maintenance and accommodation service provider Wegoshare, Lda. and the payment solution provider Stripe, Inc.
- 6. Retention of personal data
- 6.1 User data are stored for as long as the user retains an active user account.
- 6.2 In order to delete a user account, the request must be submitted to City Bike OÜ. Uninstalling the mobile application does not delete the user account.

- 6.3 Upon deletion of a user account, the personal data related to the user shall be deleted as following:
- 6.3.1 If data on financial transactions performed by the user are linked to a user account, the data shall be stored for 7 years in accordance with the Accounting Act.
- 6.3.2 If there are no financial transactions related to the user account, the data will be deleted 3 months after the submission of the deletion request for possible civil claims.
- 6.3.3 If there are no financial transactions related to the user account and the user has not used the service (has not performed any rides), the user's data will be deleted within 30 days from the submission of the deletion request.