

PLEASE NOTE: This Policy only applies to the territory of Belarus. Therefore, they will not be legally binding in any other state.
Unless you're in Belarus, please check the Privacy Policy applying to the country of your location.

Effective Date: August 19, 2024

About Whoosh

We are the Whoosh company (WHOOSH BL Limited Liability Company, UNP 193613409, address: 220117, Republic of Belarus, Minsk, Gazety Zvyazda Avenue, building 16, room 57, sharing service for electric scooters and electric bicycles).

We make all processes of the Whoosh service as transparent as possible, including how we collect, use and protect the personal information of our users. This document - the Privacy Policy - describes how we, as the Personal Data Processing Operator, process personal data that we receive when users and other persons specified in this Policy interact with our website * and / or Whoosh ** mobile application (all this together we will call "Service").

The processing of your personal data may include any action or set of actions that are performed with your personal data, including the collection, systematization, storage, modification, use, depersonalization, blocking, distribution, provision, including cross-border transfer, deletion of personal data and any other method of processing that does not contradict the legislation of the Republic of Belarus.

Please check Whoosh Platform's Terms & Conditions (also referred to as "T&C") [here](#).

We reserve the right to change this Policy from time to time. If changes are made to this document, an updated version will be immediately published on the website and in the mobile application; in the event of significant changes, users will be notified by e-mail or other means.

*<https://whoosh-bike.ru/>

** *Whoosh User Application computer program, certificate of state registration of the computer program No. 2021616094, date of state registration - 16.04.2021*

<https://apps.apple.com/ru/app/whoosh/id1418412616;>

<https://play.google.com/store/apps/details?id=com.punicapp.whoosh>

What data do we process?

User data

You are a user if you have installed the Whoosh mobile application on your device and have accepted [Terms & Conditions](#) and this Policy.

The amount of user data processed depends on the purpose of the processing (for example, customer support, registering in the mobile application). We use this data for the purposes described below. The data we may collect includes:

- Account creation data: name, e-mail, telephone, your bank card's masked details, day, month and year of birth

- When users register or use the Platform, we receive and process their location data. For example, in order to show the Whoosh electric scooters closest to the user, it is necessary to collect, record and process information about where the user's device is located right now. During the ride, we track the location of electric scooters and bicycles, along with the route and other ride data.
- In case of contacting customer support or communication in any other way, we request contact information (contact phone number and/or e-mail) in order to answer the question or help. We store the history of communication with the customer support and the information transmitted during this communication, including records of phone calls.

Website visitor data

If you visit our website, you are a visitor.

We use cookies, which are placed on your device when you visit the website; detailed conditions for the processing of cookies are given in the [conditions for processing cookies](#).

You can disable cookies in your browser settings if you do not want us to process the above information.

Job seeker data

You are a job seeker if you have submitted a job application to Whoosh using the feedback form in the [appropriate section of the website](#).

Job seekers enter and send their data to Whoosh in accordance with the form available on the website.

The data sent by applicants may include name, contact details (mobile phone number and (or) e-mail), city and desired position, as well as other data, as part of the attached resume file or in the field for placing additional information about yourself, sent at the discretion of the applicant or if necessary.

Your data will be processed by us only if you give your consent to this by ticking the box confirming that you have read the content and agree to the terms of this Policy in the box under the application form for applicants posted on the site.

Whoosh parking lot owners

You fall into this category if you intend to host a Whoosh parking lot, or, conversely, want to remove a previously equipped parking lot.

We request and use data of this category (name, phone number, email address, city, organization, proposed parking address, as well as additional information at the discretion of the person submitting the request) for the purposes indicated below.

Potential partners for promotions and other projects

You fall into this category if you are interested in working with Whoosh in marketing, advertising, bonus programs, or other partnerships.

Whoosh requires data, including name, contact information (telephone, e-mail), city, organization name, and other information at the discretion of a potential partner.

Media representatives

You fall into this category if you contact Whoosh on behalf of a media.

Media representatives submit their contact details, name of the media, and may also submit other information depending on the nature of the communication, for example,

city, position of the contact person, etc.

By providing us with personal data of third parties when using the Platform, you confirm the prior receipt of the consent of the relevant parties for such transfer.

The rights of personal data subjects

You have the right, by sending us an appropriate statement to the email address privacyinquiries@whoosh.bike, or to the Operator's address specified in this Policy:

1. To receive information concerning the processing of your personal data, including confirmation of the fact of processing your personal data, the legal grounds and purposes of processing personal data and other information provided for by law. Within 5 working days after receiving your application, we will provide you with the above information or notify you of the reasons for the refusal to provide it.

2. If your personal data is incomplete, outdated or inaccurate, request changes to your personal data from us. You must attach documents and (or) their duly certified copies confirming the need to make changes to your personal data to your application. Within 15 calendar days after we receive your application, we will make the appropriate changes and notify you of this, or we will tell you the reasons for not making such changes.

3. To receive from us information about the provision of your personal data to third parties once a calendar year free of charge. Within 15 calendar days after receiving your application, we will provide you with information about which of your personal data and to whom were provided during the year preceding the date of submission of the application, or we will notify you of the reasons for refusal to provide it.

4. Request to stop processing your personal data, including their deletion, if the processing is carried out in the absence of grounds for processing personal data provided for by the legislation of the Republic of Belarus. Within 15 calendar days after receiving your application, we will stop processing your personal data, as well as delete it (we will ensure that the processing of your personal data is stopped, as well as its deletion by Authorized Persons, if any) and notify you about it.

If it is not technically possible for us to delete your personal data, we will take measures to prevent its further processing, including blocking it, and will notify you at the same time. We have the right to refuse to satisfy your requests to stop processing your personal data and (or) delete them if there are grounds for processing your personal data provided for by law, including if they are necessary for the stated purposes of their processing, notifying you of this in fifteen day period.

5. You also have the right to withdraw your consent at any time without giving reasons. Within 15 calendar days after receiving your application, in accordance with its content, we will stop processing your personal data, as well as delete them (we will ensure the termination of the processing of your personal data, as well as their deletion by Authorized persons, if any) and notify you of this .

If it is not technically possible for us to delete your personal data, we will take measures to prevent its further processing, including blocking it, and will notify you at the same time.

We have the right to refuse to satisfy your requests to stop processing your personal data and (or) delete them if there are grounds for processing your personal data provided for by the legislation of the Republic of Belarus.

If you believe that Whoosh has violated your rights as a subject of personal data, you

can file a complaint with the National Center for Personal Data Protection of the Republic of Belarus in the manner prescribed by the legislation of the Republic of Belarus.

How do we use the information?

We use user data, including information about the user's location, for the purpose of executing the [Offer](#), solely in order to:

- at the request of the user, grant the right to use the Service, its functionality, including for creating and managing an account and travel history, as well as to provide an opportunity to purchase additional services;
- monitor, track and maintain Whoosh electric scooters or electric bicycles, including while using the Service, its functionality and/or receiving additional services;
- process payments and provide discounts, for example, the ability not to pay for the start of a trip;
- provide information about the user's account, for example, about transactions, upon request, and communicate with users as necessary, for example, if necessary, inform about changes in the rules of the Service. In accordance with the legislation in the territory where the right to use the Service is granted, its functionality/services are provided, we may also send a request for a survey or marketing messages, including information about new features and improvements to the Service;
- if necessary, comply with our legal obligations, including compliance with legal requirements;
- to detect, investigate and prevent actions that may violate the Privacy Policy and terms of use of the Service, or any illegal actions in which case we share information with law enforcement agencies;
- cooperate with third parties as described below.

We use applicant data for the following purposes:

- consideration of the employment opportunities of applicants to Whoosh, verification of the applicants' compliance with the requirements (including their qualifications and work experience);
- for prompt communication upon request;
- approval and signing of documents;
- negotiating;
- exchange of information, including documents on a specific project.

We use the data of Whoosh parking owners, media representatives and potential partners based on the content of the relevant request, for example, for:

- for prompt communication upon request;
- approval and signing of documents;
- negotiating;
- exchange of information, including documents on a specific project.

We use visitor data to find out which pages of the site were visited, which links on the site were clicked, as well as other data of user activity on the site, in order to individualize the service and improve it.

Who can we transfer data to?

Sometimes, in order to fulfill our obligations, including within the framework of [Terms & Conditions](#), we transfer user data to affiliates and partners, service providers, and third parties located in the territory of the Republic of Belarus and in other countries, provided that such persons comply with the requirements for processing personal data. We make sure that this process is safe. Here are those with whom we can partially share the data:

- Partners and service providers (Authorized persons). To fulfill our obligations, we attract trusted and reliable partners and suppliers. This includes, for example, payment processing, user support, insurance, SMS and email mailing, sending push notifications, implementing marketing or promotional campaigns, using cloud storage to place data in them, etc. For example, we transfer information to bank card issuers for processing payments and refunds, as well as to an insurance company when choosing the user of the insurance service.

You can find the full list of Authorized Persons to whom Whoosh may transfer your personal data [in the relevant section](#).

- Third parties. Subject to their prior depersonalization, we may share aggregated personal data. This may include information about trips transferred to third parties for scientific or other research purposes. For example, Whoosh cooperates with local authorities in terms of studying the specifics and volume of traffic within the city. We may also share this information in order to carry out or participate in statistical research and/or reports.
- We may transfer information to government, regulatory and law enforcement agencies only on the grounds provided for by law in response to official requests in order to comply with the requirements set out in the applicable legislation on the territory of the Service. This is done to identify, investigate, prevent and eliminate cases of fraud and other illegal activities, as well as to prevent damage to the property or health of Service users, members of the public, Service employees or third parties. Information can be transferred to government agencies and to protect the legitimate rights or property of the Service, to take action in cases of illegal actions or violations of traffic rules, to ensure compliance with the terms of use of the service indicated in the [Offer](#).
- Companies affiliated with Whoosh. For example, we may share information with affiliated companies in order to grant the right to use the Service and its functionality, including in different cities and countries.

Legal basis for using the data

As part of the Privacy Policy, Whoosh relies on a number of grounds for processing your personal data described in this document:

- Your free, unambiguous and informed consent to the processing of personal data received by us.
- The data is needed to grant the right to use the Service, its functionality, or provide additional services and fulfill their obligations under the Service [Offer](#). For example, it will be impossible to fully use the Service and its functionality if we do not have payment information or location data;

In some cases, we may process your personal data without your consent, for example:

- (i) for the organization and conduct of state statistical observations, the formation of official statistical information;
- (ii) upon receipt of personal data on the basis of an agreement concluded (being concluded) with you for the purpose of performing the actions established by this agreement;
- (iii) when processing personal data, when they are indicated in a document addressed to us as an operator and signed by you, in accordance with the contents of such document;
- (iv) to protect your life, health or other vital interests if obtaining your consent is not possible;
- (v) with respect to previously distributed personal data until the moment you declare the termination of processing of distributed personal data, as well as their deletion in the absence of other grounds for processing personal data provided for by the legislation on personal data protection;
- (vi) in cases where the processing of your personal data is necessary to fulfill our duties (powers) provided for by legislative acts, for example, the obligation to provide information to law enforcement agencies;
- (vii) in other cases provided for by law.

Neither users nor any other individuals mentioned in this Policy are obliged to submit certain personal data to Whoosh; however, it should be taken into consideration that in some cases, in the absence of personal data, we will not be able to perform certain actions.

For example, we will not be able to give the user the opportunity to use the Service and its functionality in full if we do not have the necessary data for this, or respond to an applicant's request if we do not have the information necessary to provide feedback.

Where information can be processed

Whoosh is a global service, which means that we work with our users' data all over the world and can transfer this data to other countries, including those that are not classified as providing an appropriate level of protection of the rights of personal data subjects, but in any case strictly for the purpose of fulfilling the [Contract](#) or on other legitimate grounds in a secure way.

How long is information stored

We store information for as long as it is reasonably necessary for the purposes of Whoosh, but in any case in compliance with legal requirements, for example, to grant the right to use the Service and its functionality/services, or until the account is deleted by the user, taking into account a longer period that may be required in accordance with the current legislation.

When an account is deleted, we may need additional time to completely remove information from our databases and system logs. We may also store information from deleted accounts to prevent fraud, collect payments, ensure the terms of T&C, fulfil legal obligations, or ensure our legal rights. We undertake to store your data no longer than is required by statutory time limits, so that both you and Whoosh will have the possibility of legal protection of their interests, incl. judicially.

What measures to protect personal data we implement

Whoosh independently determines the composition and list of measures necessary and sufficient to ensure the fulfillment of the obligations provided for by the applicable legislation in the field of personal data.

In particular, Whoosh has taken the following legal and organizational measures to ensure the security of personal data:

- the Privacy Policy, which you are currently reading, and the Regulation on the protection and processing of personal data have been approved;
- a person responsible for the implementation of internal control over the processing of personal data has been appointed;
- local regulations have been developed and issued defining the operator's policy in relation to the processing of personal data (including procedures aimed at preventing and detecting violations of the legislation of the Republic of Belarus);

The following organizational measures are applied:

- secure mobile code development techniques apply in accordance with best practices;
- access to confidential information on paper is limited;
- familiarization of employees with the rules of working with personal data was carried out.

The following technical measures are applied:

- anti-virus protection is applied;
- traffic is encrypted when transmitted over the Internet;
- firewall procedures have been configured.

- employees were familiarized with the conditions of working with personal data.