

**PLEASE NOTE: This Policy only applies to the territory of Kazakhstan. Therefore, they will not be legally binding in any other state.**

**Unless you're in Kazakhstan, please check the Privacy Policy applying to the country of your location.**

*Effective Date: April 11, 2025*

## **About Whoosh**

We are the Whoosh company (LLP "WHOOSH KZ"; BIN 220140018883; address: 050009, Kazakhstan, Almaty city, Almaly district, Islam Karimov str., 164.), a service for sharing electric scooters and electric bicycles.

We make all Whoosh processes as transparent as possible, including how we collect, use and protect personal information of our users. This document - Privacy Policy - describes how we handle personal data that we obtain in the interaction of users and other individuals specified in this Policy, via our website\* and/or Whoosh mobile application\*\* (all together referred to as the "Platform").

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*

## **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.

Data submitted by job seekers may include name, contact information, city and desired position, as well as other data at the discretion of the job seeker or if necessary.

#### *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, telephone, e-mail, city, organization, intended parking address, as well as additional information at the discretion of the applicant).

#### *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.

You have the right to access your personal data, you have the right to request their correction, deletion, restriction of their processing, you can object to the processing of your personal data.

If you believe that Whoosh has violated your rights as a subject of personal data, you can file a complaint with the supervisory authority at the location of the violation.

## How do we use the information?

We use user data, including information about the user's location under [Terms & Conditions](#) solely:

- at the request of the user, provide a service, including for account management and trip history;
- monitor, track and maintain Whoosh electric scooters or electric bicycles, including during the receipt of the service;
- process payments and provide discounts, for example, the ability not to pay for the start of a trip
- to provide information about the user's account, for example, about transactions, at the request of the user, and to communicate with users as necessary, for example, if necessary, to inform about changes in the rules of the Service. In accordance with the legislation in the territory where the service is provided, we may also send a survey request or marketing messages, including information about new features and improvements to the Service;
- if necessary, to fulfill our legal obligations, including to fulfill the requirements within the framework of the legislation;
- detect, investigate and prevent actions that may violate Whoosh's Privacy Policy and Terms of Service, or any illegal actions in which we exchange information with law enforcement agencies;
- cooperate with third parties as described below.

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

- for operational communication on the relevant request;
- approval and signing of documents;
- conducting negotiations;
- 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 personalize the service and improve it.

Whoosh does not distribute your data in publicly available sources.

## 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. We make sure that this process is safe. Here are those with whom we can partially share the data:

- Partners and service providers. To provide the services, we engage trusted and reliable partners and suppliers. This includes payment processing, customer support, insurance, marketing or promotions. For example, we share information with banks for the purpose of processing payments and issuing refunds, and with an insurance company when a user chooses an insurance service.
- Third parties. After removing identification data such as name, telephone and e-mail (if any), and combining the information received with similar information from other users, we may use, license and share the aggregated data. This may be ride history information provided by third parties for research, business or other purposes. For example, Whoosh works with local authorities to study the specifics and volume of transport traffic within the city.
- We can transmit information to state, regulatory and law enforcement authorities only on the grounds stipulated by the law in response to official requests, in order to comply with the requirements of the applicable law in the territory of the services provision. This is done to detect, investigate, prevent and eliminate cases of fraud and other illegal actions related to security, as well as to prevent harm to the property or health of users of the Platform, members of the public, employees of the Platform or third parties. The information may be transmitted to State bodies and for the protection of the legitimate rights or property of the Platform, for taking measures in cases of illegal actions or violations of traffic rules, for ensuring the fulfilment of the conditions of use of the service specified in [Terms & Conditions](#).
- Whoosh affiliates. For example, we can transmit information to affiliates for the provision of services under [T&C](#), including in various cities and countries.
- In case of business reorganization, we may transfer user information as part of a sale, merger, or preparation for any of these events.

In addition, we may transfer aggregated, anonymized information that cannot be used to identify a specific person by third parties, including the types of third parties listed above, for the purpose of performing or participating in statistical research and/or reports.

### **Legal basis for using the data**

As part of the Privacy Policy, Whoosh relies on a number of grounds for collecting, using, sharing and any other processing of information for the purposes described herein:

- data is needed to provide services and fulfill our obligations under [T&C](#). For example, we cannot provide a service unless we have billing information and location data;
- users of the Platform have given their consent to the processing of information, which can be withdrawn any time by reaching out to us via [privacyinquiries@whoosh.bike](mailto:privacyinquiries@whoosh.bike), or by sending a written request to our address specified in the Policy;
- this is necessary to comply with obligations imposed by law, for example, the obligation to provide information to law enforcement agencies;
- to protect the interests of users, employees of the Platform and members of the public;
- we can process personal data if it is required for statistical, marketing and/or other research purposes;

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, you will not be able to use the Platform unless we have the data necessary for this. We won't be able to respond to a job application unless we have the necessary information about the jobseeker's identity.

### **Where information can be processed**

Your personal data is stored in the Republic of Kazakhstan.

However, Whoosh is a global service and we can work with user data all over the world, including the transfer of this data to other countries strictly on legal grounds in a secure way. Before such transfers, we always receive confirmation that the receiving country ensures the protection of your personal data at a level no less than the security provided in the Republic of Kazakhstan.

### **How long is information stored**

We store information as long as is reasonably necessary for Whoosh purposes, but in any case in compliance with legal requirements, for example, to provide services or until the account is deleted by the user, whichever will be longer, taking into account the longer period that may be required under applicable law or for other reasons.

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 are committed to retaining your data for no longer than is required by legal statute of limitations, so that both you and Whoosh can protect your 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:

- approved the Privacy Policy, which you are now reading, and the Regulation on the protection and processing of personal data;
- a person responsible for organizing the processing of personal data has been appointed;

The following organizational measures are applied:

- apply techniques for secure development of mobile code in accordance with best practices;
- access to confidential information on paper is limited.

The following technical measures are applied:

- anti-virus protection of devices is applied;
- traffic is encrypted during transmission over the Internet;
- configured firewall rules.

Employees were familiarized with the rules for working with personal data.

