

## Privacy policy

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

*Effective Date: October 19, 2022*

### About Whoosh

We are Whoosh (WHOOSH LLC; Primary State Registration Number 1187746542180; Taxpayer Identification Number 9717068640; Registered office: 12 Zamorenova Str., building 1, Moscow, 123242; support@whoosh.bike), electric scooter and bicycle sharing service.

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 demand the data's correction, deletion, restriction of their processing, you can object to the processing of your personal data, and you also have the right to data portability.

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, to provide a service, including managing the account and ride history;
- to control, track and maintain Whoosh electric scooters or electric bicycles, including while receiving the service;
- to process payments and provide discounts, for example, not paying for the start of a ride;
- to provide, upon the user's request, information about their accounts, for example, about transactions, and communicate with users as needed, for example, if necessary, inform about changes in T&C. In accordance with the legislation in the territory where the service is provided, we may also send a request for a survey or marketing messages, including information about new features and improvements to the Platform;
- if necessary, to comply with our legal obligations, including compliance with legal requirements;
- to detect, investigate and prevent actions that may violate the Whoosh Privacy Policy and [T&C](#), or any illegal actions, in which case we exchange information with law enforcement agencies, including foreign ones;
- to cooperate with third parties as described below.

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

- prompt communication upon request;
- approving and signing documents;
- negotiating;
- exchanging information, including documents on a specific project.

We use the data of visitors to find out which pages of the website were visited, which links on the website were followed, as well as other data of user activity on the website, in order to personalize the Platform 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. 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.

You can find a complete list of third parties to which Whoosh may transfer your personal data in the [corresponding section](#).

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 and other research purposes, as well as to achieve socially significant goals;
- processing is carried out on the basis of our legitimate interest. Such interests may include, without limitation, development of our Platform, establishment/development of partnerships with contractors, etc..

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**

Whoosh is a global service, which means that we work with the data of our users all over the world and can transfer this data to other countries, but strictly for the purpose of providing services or on other legal grounds in a secure way. At the same time, before such a transfer, we always make sure that such countries provide adequate protection of your personal data; thus, your personal data will be protected no less safe than in the territory of Russia.

### **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 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.

### **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;
- the Personal Data Protection Manager 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 Russian Federation);
- 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.
    - 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.