

PRIVACY POLICY

1. INTRODUCTION

We have prepared this Privacy Policy to inform you how we collect, process, use and protect your personal data, and thus help protect your privacy.

We process your personal data in accordance with valid legislation, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“**GDPR**”) and Act No 480/2004, on Certain Information Society Services, as amended.

At the same time we would like to explain to you, through this Privacy Policy, the most important terms and processes we use to protect your personal data, and to answer questions you may have in connection with the collection, processing and storing of your personal data.

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2. OUR APPROACH

We consider personal data protection to be very important and we pay close attention to it.

You may thus be sure that we treat your personal data with due care and in accordance with valid legislation, and that we protect your personal data to the maximum possible extent using the corresponding technical standards.

We recommend you read this Privacy Policy carefully to fully understand how we protect your personal data.

3. LEGAL TITLES FOR PROCESSING YOUR PERSONAL DATA

We obtain your personal data from you and further process them solely within the necessary scope and for the fulfilment of the respective purpose. We process your personal data in particular in connection with the performance of a concluded contract and the provision of our services, and potentially based on our legitimate interest, our legal obligation or your consent. When certain conditions are met you may request erasure of the processed personal data (see chapter “**5. Your rights**”).

We obtain the personal data within the necessary scope already at the conclusion of a framework agreement on the provision of the BeRider service, and we obtain additional personal data from you during the term of the contractual relationship. This is because without such data we would not be able to meet your requirements and conclude the agreement in question with you, in particular with regard to compliance with our legislative obligations, but also with regard to the protection of our legitimate interests.

The main titles for the processing of your personal data are:

- **Consent** – you grant your consent for one or more specific purposes (for example for the sending of commercial communication by third parties). We observe the following rules when obtaining your consent to the processing of your personal data: (i) we will always secure individual consents to the processing of your personal data, meaning the granting of consent will not be part of a contract or other agreement, (ii) the text of the consent will always be intelligible, (iii) consent will always be actively granted by you and no boxes will be checked for you in advance, (iv) you will grant your consent separately for each purpose.
- **Performance of a contract** – in this case we need your personal data for the purposes of entering into a contractual relationship and its subsequent performance, possibly also before conclusion of the contract.
- **Compliance with a legal obligation** – in this case we need your personal data for the purpose of their processing for compliance with our legislative obligation as controller.
- **Legitimate interest** – the processing of your personal data would be necessary for the purposes of our legitimate interests, however except where such interests are overridden by your interests or fundamental rights and freedoms.

4. PURPOSES OF PERSONAL DATA PROCESSING

As we have already mentioned in chapter “**3. Legal titles for processing your personal data**”, it is necessary that all our processing of your personal data is based on a legal title and is carried out for a particular purpose.

The purposes for which we will process your personal data, and the legal titles for us to do so, are the following:

- **Registration of a user and maintenance of his/her account on the BeRider platform** – the legal title is the entry into a contract with you and performance of the obligations arising from that contract.

- **Provision of a scooter rental service within the BeRider project** – the legal title is the entry into a contract with you and the performance of the obligations arising from that contract. This purpose also includes keeping services functional and safe, debugging, and updating features. Some features may require permissions to share data (e. g. location, movement activity).
- **Registration and archiving of personal data of BeRider platform users** – the legal title is our legitimate interest in securing protection for us against possible claims raised against us and the protection of our rights and legal claims.
- **Sending of commercial offers for our products and services and news** – the legal title is our legitimate interest since we would like to offer you our products and services, as well as provide you with up-to-date information.
- **Ensuring the quality of services, creation of analyses, surveys and statistics** – the legal title is our legitimate interest in ensuring the proper functioning of the services we provide and in improving of quality of those services.
- **Compliance with our legal obligations** – the legal title is compliance with our legal obligations, in particular in taxation and accounting.

5. YOUR RIGHTS

The protection of personal data would of course not be complete if you had no rights in relation to such protection. Below you can find your rights connected with the personal data protection together with practical explanations of their application:

- **The right to withdraw your consent** allows you to withdraw any prior consent to the processing of personal data. In such case we will not process your personal data for that purpose any longer. However, withdrawal of consent will not affect the lawfulness of processing based on such consent before its withdrawal.
- **The right to access personal data** – you have the right to request us to inform you about whether we process your personal data and, where that is the case, in what scope. You also have the right to request a copy of the processed personal data. If you request a copy, we must also inform you of the purpose of the processing, any recipient of the processed personal data and possibly other related information.
- **The right to correction** allows you, for example, to request us to modify any of your personal data that we process, if there has been a change to them (for example a change of surname, address etc.).
- **The right to erasure** or the “right to be forgotten” imposes on us, as controller, the obligation to erase your personal data in the following cases:
 - the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed (for example after the termination of a contractual relationship),
 - you withdraw your consent to the processing of your personal data and there is no other legal ground for processing your personal data (for example the withdrawal of marketing consent provided that you do not have, for example, a contractual relationship with us),
 - you object to the processing (provided that your objection is acceptable and there is no legal ground for the processing of your personal data),
 - the personal data have to be erased to comply with valid legislation (for example an obligation to shred).
- **The right to restriction** of processing allows the data subject to request restriction of processing of all or some of his/her personal data for a certain period of time in specific cases specified by the applicable regulations. For example, this is the case where the data subject denies the accuracy of his or her personal data and this needs to be verified.
- **The right to object** is similar to the right to withdraw consent, and may be exercised if the personal data are processed based on a legitimate interest (for example for the purpose of protection of our property). You may also object if your personal data are processed for the purpose of direct marketing. In justified cases the processing of your personal data will be stopped after the objection is accepted.
- **The right to data portability** if you request us to transfer your personal data to another controller, we must provide such data in a structured, commonly used and machine-readable format. You may exercise this right only if the processing is based on consent or on a contract and at the same time the processing is carried out by automated means.
- **The right not to be subject to automated decision-making** means that if the processing of your personal data carried out solely by automated means without any human intervention is to be the basis for a certain decision with legal or other significant impacts, you have the right to request that your personal data shall be assessed by a person.

6. RULES FOR SHARING YOUR PERSONAL DATA WITH THIRD PARTIES

The rules, according to which we share your personal data with our processors, are divided into two basic categories.

The first category includes sharing of personal data within the European Union and European Economic Area; the second category includes sharing to third countries outside the European Union and European Economic Area and sharing with international organizations.

In order to share your personal data with a processor within the European Union and European Economic Area, we ensure that:

- the personal data are shared for a particular purpose (for example the preparation of a marketing campaign),
- only a clearly determined and necessary scope of personal data are shared,
- such transfers are based on duly concluded data processing agreements,
- the transfers are secure (using encryption, pseudonymisation etc.).

If we share your personal data to third countries outside the European Union and European Economic Area and/or to international organizations, we will do so solely with entities having their seat in countries that the European Commission has decided ensure an adequate level of personal data protection, or based on standard contractual clauses, i.e. model contracts issued by the European Commission.

In the event that our business changes and we transfer it or certain activities thereof, in whole or in part, to another person (including assignment of contracts), such transfer would include personal data relating to those activities. For these purposes, information (including personal data) relating to our business may be shared with other parties in order to evaluate and conclude the transaction. This would also be the case if we were required by law to make such changes. Upon a lawful request, your personal data may also be provided to public authorities, in particular courts, the Police of the Czech Republic and other law enforcement authorities to the extent necessary and within the limits of the law.

7. CATEGORIES OF PERSONAL DATA

Here you can find the separate personal data categories and the data we include in them:

- **Identification data:** name, surname, place of residence, date of birth, application login.
- **Contact data:** correspondence address, telephone number, e-mail address.
- **Data on the BeRider platform account:** your login, encrypted password (hash), login time, and actions in the platform after logging in.
- **Scooter information:** scooter make, model, production year, colour, license plate, VIN code and MOT certificate.
- **Reviews and related communication:** responses in surveys, complaints / suggestions / proposals / requests / inquiries and their handling, service requirements, evaluation records.
- **Data concerning the use of services:** riding history, including related information (journey duration, locality), records of mutual communication, e-mail communication, behaviour or browsing / clicking / searching and listening / browsing relating to the Internet / e-mails / media / applications, information obtained through feedback / surveys / comments / proposals / complaints in relation to the controller, agreement / disagreement with a type or form of communication.
- **Data about internal control and investigation:** internal system logs.
- **Documents:** driving license data, identity card data, including scans or photographs of such documents, and credit card number, including validity dates and security code.
- **Photographs:** photograph from the driving license or identity card.
- **Recordings** of customer support calls - call recording, and its evaluation for some selected calls.
- **Location data:** location data based on GPS, location data derived from other operations.
- **Online identifiers:** Mac address, IP address, Device Fingerprint, cookies or similar technology, browser information.

8. CONTACT FOR QUESTIONS OR IF YOU ARE UNCERTAIN ABOUT ANYTHING

Should you be uncertain about any part of this Privacy Policy or should you have any question or comments regarding the protection of your personal data, please do not hesitate to contact the ŠKODA AUTO DigiLab Data Protection Officer: dpo@skodaautodigilab.com, www.skodaautodigilab.com.

9. SUPERVISION

We pride ourselves on complying with all determined and binding rules and security measures when processing your personal data, and we trust you will never be dissatisfied with our behaviour towards you.

If, however, you find that you still disagree with how we process your personal data, you may contact:

Office for Personal Data Protection

address: Pplk. Sochora 27, 170 00 Prague 7

tel.: 234 665 111

web: www.uoou.cz

Information on personal data processing in the BeRider platform

We - ŠKODA AUTO DigiLab s.r.o., with registered office at Jankovcova 1603/47a, Holešovice, Prague 7, post code 170 00, company identification No: 05976359, incorporated in the Companies Register kept by the Municipal Court in Prague under file No C 274001 (hereinafter referred to as “ŠKODA AUTO DigiLab”), and BeRider s.r.o., with registered office at Jankovcova 1587/8d, Holešovice, Prague 7, post code 170 00, company identification No: 08073198, incorporated in the Companies Register kept by the Municipal Court in Prague under file No C 312533 (hereinafter referred to as “BeRider”) – as joint controllers hereby provide you with information on personal data processing and on your rights related to this processing.

The processing is carried out as part of the following activities:

1. Purpose of the processing:

User registration and maintenance of his/her account in the BeRider platform

Purpose of the processing:

We process your personal data in order to register you as a user of the BeRider platform and maintain your account.

Legal basis for the processing:

We must carry out the processing in order to conclude a contract with you, respectively to perform a contract you have concluded, and to provide you with access to the BeRider platform. The provision of your personal data is necessary for the conclusion of the contract, and if you do not provide the data a contract will not be concluded or it will not be possible to perform an already concluded contract.

Categories of personal data we process:

Identification data; contact data; data about the account in the BeRider platform; scooter information; data about the use of services; photographs; documents; reviews and related communication including support calls (as far as registration and account management are concerned); online identifiers.

Period of processing and archiving:

We process and archive the personal data for the term of the framework agreement for providing our services concluded with you, or for the period of performance of obligations arising from the agreement.

Categories of other processors or recipients to which we may provide the personal data:

ŠKODA AUTO a.s.; service agencies, marketing agencies, IT infrastructure providers (Spinoco Czech Republic, a.s.), analytics and statistics companies.

Origin of personal data:

Directly from you or from your use of the BeRider platform.

2. Purpose of the processing:

The provision of a scooter rental service within the BeRider project

Purpose of the processing:

In connection with your registration as a person authorized to use BeRider platform services, we process your personal data in order to provide our service, comprising of short-term scooter rental to you, respectively to perform a contract you have concluded with us.

Legal basis for the processing:

We must carry out the processing in order to conclude a contract with you, respectively to perform a contract you have concluded. The provision of your personal data is necessary for the conclusion of a contract, and if you do not provide the data it will not be possible to conclude a contract or to perform an already concluded contract.

Categories of personal data we process:

Identification data; contact data; data about the account in the BeRider platform; scooter information; data about the use of services; photographs; documents; location data; related communication including support calls (as far as service provision is concerned).

Period of processing and archiving:

We process and archive the personal data for the term of the framework agreement for providing our services concluded with you, or for the period of performance of obligations arising from the agreement.

Categories of other processors or recipients to which we may provide the personal data:

The providers of other related services, in particular the operator of the sharing application, TORROT ELECTRIC EUROPA, S.A., IT infrastructure providers (Spinoco Czech Republic, a.s.).

Origin of personal data:

Directly from you or from your use of the BeRider platform.

3. Purpose of the processing:

The registration and archiving of personal data of BeRider platform users

Purpose of the processing:

If you want to enter into a contract with us, if a contract has been concluded, and also if a contract is terminated, e.g. also in the form of cancellation of your registration, we will continue processing your personal data within the scope necessary for our protection against possible claims raised against us and the protection of our rights and legal claims, in particular in judicial, out-of-court or enforcement proceedings.

Legal basis for the processing:

We have a legitimate interest in carrying out this processing. Such legitimate interest rests in protection against possible claims raised against us and protection of our rights and legal claims.

Categories of personal data we process:

Identification data; contact data; data about the account in the BeRider platform; scooter information; data about the use of services; reviews and related communication including support calls; data about internal control and investigation; photographs; documents; location data; online identifiers.

Period of processing and archiving:

We process and archive the personal data for the term of your contractual relationship with us and further for 16 years after termination of a concluded contract. In the event of initiation of judicial, administrative or other proceedings, we will process your personal data within the necessary scope for the term of such proceedings.

Categories of other processors or recipients to which we may provide the personal data:

The operator of the sharing application, TORROT ELECTRIC EUROPA, S.A. and providers of other related services (e.g. Spinoco Czech Republic, a.s.)

Origin of personal data:

Directly from you or from your use of the BeRider platform.

4. Purpose of the processing:

The sending of commercial offers of our products and services and news

Purpose of the processing:

We process your data in order to inform you of commercial offers of our products and services and of news in relation to the BeRider platform.

Legal basis for the processing:

We have a legitimate interest in carrying out this processing. Such legitimate interest rests in our interest in providing you with up-to-date information and offering you our products and services, which are relevant for you and in which you might be interested.

Categories of personal data we process:

Identification data; contact data; data about the account in the BeRider platform; data about the use of services; reviews and related communication.

Period of processing and archiving:

We process and archive your personal data for the term of your contractual relationship with us and further for 1 year after termination of a concluded contract.

Categories of other processors or recipients to which we may provide the personal data:

Marketing agencies, analytics and statistics companies. **Origin of personal data:**

Directly from you or from your use of the BeRider platform.

5. Purpose of the processing:

Ensuring the quality of services, creation of analyses, surveys and statistics

Purpose of the processing:

In order for us to duly ensure the functioning of the services we provide and to improve the services, we need to process information on their use, including personal data, to create analyses, surveys and statistics. If the contract with you is terminated, e.g. also in the form of cancellation of your registration, we will continue processing your personal data but only within the minimum scope necessary for the creation of surveys and statistics.

The legal basis for the processing:

We have a legitimate interest in carrying out of this processing. Such legitimate interest rests in ensuring the proper functioning of the services we provide and in improving the quality of such services.

Categories of personal data we process:

Identification data; contact data; data about the account in the BeRider platform; scooter information; data about the use of services; reviews and related communication including support calls; data about internal control and investigation; location data; online identifiers.

Period of processing and archiving:

We process and archive your personal data for the term of your contractual relationship with us and further for 3 years after termination of a concluded contract. We will use support calls to check the quality of services for a period of 3 months.

Categories of other processors or recipients to which we may provide the personal data:

IT infrastructure providers (Spinoco Czech Republic, a.s.), analytics and statistics companies. **Origin of personal data:**

Directly from you or from your use of the BeRider platform.

6. Purpose of the processing:

Compliance with our legal obligations

Purpose of the processing:

Selected legislation impose obligations on us which we must comply with and which comprise in the processing of your personal data. We will therefore process your personal data, but only in the necessary scope and only for the period determined below.

The legal basis for the processing:

We process your personal data based on the legal title of compliance with our legal obligations, in particular in taxation and accounting.

Categories of personal data we process:

Identification data; contact data; data about the account in the BeRider platform; data about the use of services.

Period of processing and archiving:

We process and archive your personal data for the term for which the applicable legislation requires us to process them.

Categories of other processors or recipients to which we may provide the personal data:

External tax, accounting, and legal advisors, IT tools and infrastructure providers. **Origin of personal data:**

Directly from you or from your use of the BeRider platform.



What are your rights?

In regard to the processing of your personal data you have the following rights:



Access to processed personal data.



Correction of inaccurate or incorrect data or completion of incomplete data.



Erasure of personal data in the event of extinction of the purpose for the processing or in the event of unlawful processing.



Restriction or blocking of processing of the personal data.



An extract from the personal data in a structured and machine-readable format for you or for another controller.



Objection to the processing of the personal data if you think the processing is not legitimate.



Not to be a subject of automated decision-making.



How can you exercise your rights?

You may use the following contacts to communicate with ŠKODA AUTO DigiLab and BeRider regarding personal data protection:



E-mail address:

dpo@skodaautodigilab.com

or



Postal address:

ŠKODA AUTO DigiLab s.r.o.
Jankovcova 1603/47a
170 00 Prague 7 – Holešovice

In connection with the exercise of your rights, ŠKODA AUTO DigiLab and BeRider may require reasonable payment not exceeding the costs for the settlement of the request, where such request is manifestly unfounded or excessive.



Data Protection Officer

Should you have any questions concerning personal data protection you may contact the ŠKODA AUTO DigiLab Data Protection Officer.



www.skodaautodigilab.com



dpo@skodaautodigilab.com



Lodging a complaint

If you do not agree with how we process your personal data, to protect your rights you may lodge a complaint with the ŠKODA AUTO DigiLab Data Protection Officer or lodge a complaint with the supervisory authority.



Office for Personal Data Protection, Pplk.
Sochora 27, 170 00 Prague 7



+420 234 665 111



<http://www.uoou.cz/>