

# Privacy Policy

## 1 **PRIVACY POLICY VanMoof B.V. and its affiliates**

1.1 We are VanMoof. We respect your privacy and private life, but sometimes we need your personal data. In this privacy policy we explain which data we use and how we save, protect and process these data. This privacy policy applies to the use of:

1.1.1 our website <https://www.vanmoof.com> (the "Website")

1.1.2 the services that we offer (the "Services")

1.1.3 our app (the "App").

1.2 We comply with the General Data Protection Regulation (the "Relevant Legislation.") We have updated this policy on February 15, 2021.

## 2 **Are you under the age of sixteen?**

2.1 If you are younger than sixteen years old, you cannot use our Website, Services and App without the permission of your parents or legal guardian.

## 3 **Personal data**

3.1 To offer our Website, Services, App we process personal and non personal data. "Personal data" means any information relating to an identified or identifiable natural person as defined in the Relevant Legislation

## 4 **Lawful basis**

4.1 We can collect and process your data at various moments, for example when you visit our Website, create an account via our Website for example for making a purchase, use our Services, install and use our App or Rides feature or when you contact us. The lawful basis for our processing is

4.1.1 the necessity to carry out the agreement between you and us,

4.1.2 compliance with legal obligations and

**4.1.3** the consent we have obtained via this privacy policy, and

**4.1.4** our legitimate interests or the legitimate interests of a third party.

## **5 What data do we collect and process and how do we use your data?**

5.1 To use our Website and Services we need the following data. We need these data for your interactions with VanMoof via digital/electronic tools such as email or telephone; e.g. to process your order efficiently and correctly, to connect you to your bike, for pre and post sale services, for the use of your account, to improve our services and for any other business/commercial purposes:

**5.1.1** Your name

**5.1.2** Your address

**5.1.3** Your residence

**5.1.4** Your phone number

**5.1.5** Your e-mail address

**5.1.6** Your IP-address

**5.1.7** Your payment details

**5.1.8** Your shipping address

**5.1.9** Your username and password

5.2 For some orders (for our B2B partners) we also need:

**5.2.1** Company name

**5.2.2** Date of birth

**5.2.3** IBAN number

5.3 We can also collect and process the following non-personal data if you use our Website:

**5.3.1** The type of your browser

**5.3.2** The operating system that you use

**5.3.3** The internet service provider

5.4 We can also collect and process the following non-personal data if you use our App. We use these data to provide support and improve our services:

5.4.1 Operating system & version

5.4.2 Type of Device

5.4.3 App version

5.4.4 Firmware version

5.4.5 Bike settings:

5.4.5.1 Speed Limit

5.4.5.2 Total distance

5.4.5.3 Battery Level

5.5 After your explicit consent we separately collect and process the following non personal data when you are using our Rides feature. We use these data to provide support and improve our services:

5.5.1 Bike state & app state

5.5.2 Speed

5.5.3 Battery level

5.5.4 Distance

5.5.5 Temperature

5.5.6 Boost Behaviour

5.5.7 Alarm Triggers

5.6 After your explicit consent, you allow the App to access Bluetooth and GPS data (each also called location data). The App allows you to use Bluetooth data locally on your telephone. The App does not share the location data with third parties. VanMoof does not collect the location data on its servers, nor uses or shares it.

## 6 Market research

6.1 We may ask you to participate in market research. In that case we shall use your data for that market research. We use that statistical data anonymously for VanMoof B.V. You can

close the question list at any moment. We do not share your answers with others or make them publicly available. In addition, your answers are not connected to your e-mail address.

## **7 Newsletter**

7.1 VanMoof B.V. offers newsletters. That way, you are fully informed of (discount)offers and other news. We use a double opt-in system to be sure of your permission. This means that you verify your permission for any new confirmation. We ask you for this verification via an e-mail that we send to the address you have given us. Every time we send you a newsletter you have the possibility to unsubscribe from the newsletter.

## **8 Security**

8.1 We observe reasonable procedures to prevent unauthorised access to, and the misuse of, personal data.

8.2 We use appropriate business systems and procedures to protect and safeguard the personal data you give us. We also use security procedures and technical and physical restrictions for accessing and using the personal data on our servers. Only authorized personnel are permitted to access personal data in the course of their work.

## **9 How long do we store your data?**

9.1 We will retain your personal data for as long as we deem it necessary to enable you to use our services, to provide our services to you (including maintaining the online user account (if created)), to comply with applicable laws, resolve disputes with any parties and otherwise as necessary to allow us to conduct our business, including to detect and prevent fraud or other illegal activities. All personal data we retain will be subject to this Privacy Policy.

## **10 With whom do we share your personal data?**

### **10.1 Processors**

We may share your personal data with others. In a data processing agreement, we shall agree with those parties that they shall use your data carefully and they shall only receive the data that is relevant for their services. These parties use your data in accordance with our instructions and not for their own purposes. We can share your data for example with

marketing analytics, advertising platforms, payments platform, cloud based data warehousing. They will store and visualize data, process transactions, personalized advertisements. These parties are "processors" within the meaning of the Relevant Legislation

## 10.2 Third parties

Sometimes we share your data with third parties who are not processors, as per contractual obligation. We will agree with those parties that they will use your data carefully. They will only use your data in accordance for the purposes that we received your data for.

## 11 Transfer

11.1 As a standard we will only process your data within the European Union. We will only process your data outside of the European Union if the country has an effective protection level for your data.

11.2 We will never transfer your data to other countries or other parties then described above.

## 12 Links

12.1 You may find advertising or other content on our Website that link to other websites. We do not control the content on these websites and are not responsible for the content or the privacy protection of these websites. We advise you to read the privacy policies of those websites.

## 13 Cookies

13.1 Cookies are little (text) files which are stored on your computer. Your web browser stores these cookies when you visit our Website. These cookies will be retrieved when you visit our website again. This allows our Website to recognise you as a previous visitor.

13.2 We may use cookies to improve your user experience on our Website. Cookies are essential for the operation of our Website, make sure that you can visit our Website safely and track bugs and errors at our Website.

13.3 By storing cookies we make sure that:

- 13.3.1 your items are kept in the shopping cart
- 13.3.2 you are logged in and be able to shop without hindrance
- 13.3.3 you shop safely at VanMoof B.V.
- 13.3.4 the Website works efficiently
- 13.3.5 we can test improvements
- 13.3.6 we can advise you based on your former views and/or purchases
- 13.3.7 you receive complete local information

13.4 You can change your cookie settings in your browser, if you don't want cookies to be sent to your device. We will not save cookies if you visit our Website. Please note that some Website features or services of our Website may not function properly without cookies.

## 14 Your rights under GDPR

14.1 The data we collect are personal. Therefore, you have the following rights:

- 14.1.1 You may request access to the personal data we process about you;
- 14.1.2 You may request us to correct, update, shield or delete your personal information in our records;
- 14.1.3 You may request a copy of the personal data we have processed about you. We can - on your request - send this copy to another party, so you don't have to send the data yourself;
- 14.1.4 You may file a complaint against processing your data;
- 14.1.5 You may file a complaint with the Dutch Data Protection Authority(Autoriteit Persoonsgegevens), if you are under the impression that we process your data unlawfully;
- 14.1.6 You may always withdraw your consent to process your data. In that case we will no longer process your data for the purpose for which consent is necessary.

14.2 Should you have further questions regarding this privacy policy, please contact us via the information below.

## **15 Contact information**

15.1 VanMoof B.V.  
Mauritskade 55  
1092AD, Amsterdam  
The Netherlands  
Private Company with Limited Liability  
KvK-number: 34227663  
+31202051079  
support@vanmoof.com