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1. About this Privacy Notice

This Privacy Notice (“Notice”) describes how Bolt Operations OU (“Bolt”, “We” or “Us”) and its group companies and third party partners collect and use the personal data of persons arranging passenger rides services via the Bolt App - each known as a “Passenger”. More information about Bolt and its group companies, such as the relevant Bolt group company for your market, is set out [here](#).

The term “you” or “your” refers to a Passenger. This Notice lets you know how we promise to look after your personal data and tells you about your privacy rights and the choices and controls available to you.

This Notice applies to all individuals globally who use the Bolt Platform to request and receive a ride via the Bolt App. This Notice should be read in combination with all terms and conditions, guidelines and policies that apply to your use of the Bolt services as are made available for your market at <https://bolt.eu/legal>.

2. How do you contact us?

Bolt (or the relevant Bolt group company for your market - as set out [here](#) in more detail) is the data controller of your personal data processed under this Notice. We have appointed a Global Data Protection Officer and an Office of the Data Protection Officer Team who can be contacted by emailing our Privacy Mailbox at privacy@bolt.eu - please mark the subject line of the email ‘*For the attention of Bolt’s Data Protection Officer*’. You can also raise any privacy-related questions by contacting our Customer Support Team in the Bolt App when you go to the main menu and tap ‘Support’, the Customer Support Team will then escalate the issue internally to Bolt’s Privacy Legal Team.

3. What personal data do we process?

We collect and process personal data:

- provided by you to Bolt;
- when you use the Bolt App; and
- from other sources such as authorised third parties who administer services on behalf of Bolt, and in some countries, governmental or public databases.

The table below sets out the different categories of personal data we process about you:

Category of personal data	Description of personal data
Personal data provided by you to Bolt	
Profile Data	<p>We collect personal data about you when you register to access the Bolt Platform and/or use the Bolt App including:</p> <ul style="list-style-type: none"> • Full Name • Email address • Login name and password • Phone number • Profile photo (optional) • Home or work address (optional) • Saved favourite locations (optional) • Date of birth (optional) • Preferences and settings related to the account, such as language preferences, communication preferences and notification settings
Payment Data	We collect details of your payment methods including payment card type, bank name, bank account number, bank account sort code, related payment verification information and transaction history on the Bolt Platform.
Identification / Verification Data	We collect identification documents including government-issued or national identity documents (such as passports, driver's licences or national ID cards) and photographs/pictures (such as a selfie) you submit yourself.

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Category of personal data	Description of personal data
Demographic Data	We collect demographic data such as your age and gender.
Survey / Interview Data	We collect the content of your replies or attachments you may send us, during the course of surveys and interviews that we conduct.
Personal data we collect about you when you use the Bolt App	
Geolocation Data	<p>We collect data about your precise and/or approximate geolocation (including GPS, and IP address) from your mobile device depending on your app settings and device permissions, when you open and use the Bolt App.</p> <p>You may use the Bolt App without enabling collection of Geolocation Data from your mobile device. This may affect some features on the Bolt App and you may have, for example, to enter your pickup address.</p>
App Usage Data	We collect personal data via the Bolt App about your use of the Bolt services. This includes: details of journeys (date and time, pick -up and drop-off addresses, journey distances and routes), payment history (including whether you used any coupons or promotional codes), cancellation history, dates and times you log-in and log-off the Bolt App and app features or pages viewed, browser type, app crashes and other system activity.

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Category of personal data	Description of personal data
Communication Data	<p>We collect communication and correspondence data when you engage with our Customer Support Team via the in-app chat function, report an incident, communicate via emails or speak with our Customer Support agents, or communicate with Drivers via the Bolt App using the in-app chat function or via internet calls (where available).</p> <p>We record the date and time of the communications and its content and your phone number (where you use the call feature). We will record calls, only where you are notified in advance that the call may be recorded. In the markets where we facilitate phone calls and text messages between Drivers and Passengers without sharing either party's actual phone number with the other, we protect your personal data by using a masked numbers application.</p>
User Generated Data	<p>We collect personal data when you use certain features. For example to provide recordings such as audio recordings generated during the trip (as part of our safety toolkit trip audio recording feature, where such feature is available - for more information, please visit https://bolt.eu/en-ee/driver/safety/), or to submit content like pictures, videos, files in connection with a Customer Support request or ratings or feedback about other users, including compliments that you have the option to give to Drivers, when you finish your ride, along with a 5 star review. This also includes metadata relating to the method you use to communicate with Bolt.</p>
Warning and Suspension Data	<p>We collect details of warnings and suspensions that have been issued to a Passenger. This includes: the date(s) on which warnings or suspensions have been issued and the date of expiry of a warning or suspension.</p>
Device Data	<p>We collect data about the devices you use to access the Bolt App, including the hardware model, device IP address and other unique device identifiers (such as your UUID and advertising identifiers), device operating system, browser version, device vendor name, app version, identity of carrier and manufacturer and preferred languages.</p>

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Category of personal data	Description of personal data
Calendar Data	If you set your device permissions or choose to give Bolt access to your chosen calendar, we will collect information available in your calendar such as event details to use in providing you certain optional features. For example, to remind you of scheduled rides and get alerts to order a ride for your upcoming trip.
Cookies, SDKs, Analytics, and Third-Party Technologies Data	We collect information through the use of cookies, tracking pixels, data analytics tools, SDKs, and other third-party technologies like advertising IDs to understand how you navigate through the Bolt App, to make your experience safer, to improve your site and Bolt App experience, to serve you better ads on other sites (according to your marketing preferences), and to save your preferences. For more information about cookies, see our Cookie Declaration .
Personal data we collect about you from other sources	
Contact Data	We collect contact data about you: when you connect to the Bolt App via a third party service such as LinkedIn, Facebook or Twitter, when another Passenger refers you through our referral campaigns or orders you a ride, or if you use the Bolt App through your employer's Bolt Business account. This includes your: <ul style="list-style-type: none"> • Full name • Email address • Phone number
Rider Rating Data	We collect ratings and feedback via comments about you from Drivers after each trip. Drivers are required to rate a Passenger from 1 to 5 stars, based on their trip experience and where a Driver assigns a low score to a Passenger (1-3 Stars), the Driver will be required to provide mandatory feedback for that Passenger. Your average Rider Rating is calculated based on the total sum of your ratings divided by the total number of journeys over a 365 day period and is accessible to you in the Bolt App. The rating will be linked to your account and only your average Rider Rating will be visible to Drivers in the Bolt App when they accept a journey. If we find out the rating or comment is not

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Category of personal data	Description of personal data
	given in good faith, this rating or comment may not be included in the calculation of your rating.

4. What purposes do we use your personal data for and what is our legal basis for processing?

The table below sets out:

- our purpose for processing your personal data;
- our legal grounds (known as a '**legal basis**') under data protection law, for each purpose; and
- the categories of personal data we use for each purpose. Learn more about what personal data these categories include in Section 3 "*What personal data do we process?*" above.

Evaluation Warning: The document was created with Spire.Doc for Python. This is a general explanation of each legal basis that Bolt relies on to process your personal data to help you understand the table below:

- **Performance of a Contract:** When it is necessary for Bolt (or a third party) to process your personal data to provide you with the Bolt services we promised you and meet our obligations under the Terms and Conditions for Passengers. Where the legal basis for processing your personal data is performance of a contract, and you choose not to provide the information, you may be unable to use the Bolt services.
- **Legitimate Interests:** When we process your personal data relying on legitimate interest grounds. This includes our commercial and non-commercial interests in providing an innovative, personalised and safe service to you, other Passengers, and other third parties (including Drivers). Where the table below states that we rely on legitimate interests, we have provided a brief description of the legitimate interest. If you would like more information about this (including the balancing test), please contact us using the methods set out in Section 2 "*How do you contact us?*" above. In countries where legitimate interest is not an available lawful basis for Bolt's processing activities, we will instead rely on an alternative valid legal basis.

- **Consent:** When we ask you to actively indicate your agreement to our use of your personal data for a certain purpose of which you have been informed of. Where we rely on consent to process your personal data, you can withdraw your consent to such activities at any time. Withdrawal of the consent does not affect the lawfulness of any processing which took place prior to you giving your consent to us.
- **Compliance with Legal Obligations:** When we must process your personal data to comply with a law or regulation in the markets we operate in, such as to comply with our licensing conditions and our obligations under tax and accounting laws. Where the legal basis for processing your personal data is compliance with legal obligations, and you choose not to provide the information, you may be unable to use the Bolt services.
- **Vital Interests:** When we process your personal data where it is necessary to protect your vital interests or those of others, for example in the event of an emergency or an imminent threat to life.

Purpose of processing	Legal Basis	Categories of Personal Data
For the provision of the Bolt services		
To create, update and maintain your Bolt account	<ul style="list-style-type: none"> • <i>Performance of a Contract</i> 	<ul style="list-style-type: none"> • Profile Data • Device Data
To authenticate your account and verify your identity We collect information to verify who you say you are and in certain circumstances to verify your age and eligibility for a Bolt account, when required by local law. If we ask you to verify your identity (either upon registration or as a result of unusual activity being detected on your Bolt account) and you are not able to verify, the Bolt services will be suspended to	<ul style="list-style-type: none"> • <i>Performance of a Contract</i> • <i>Compliance with Legal Obligations</i> • <i>Legitimate Interests</i> - It is in our interest and in the interest of our Drivers to prevent and address unauthorised uses of Bolt accounts 	<ul style="list-style-type: none"> • Profile Data • Identification / Verification Data • Device Data • Geolocation Data • App Usage Data

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Purpose of processing	Legal Basis	Categories of Personal Data
<p>prevent fraud until the verification process is completed. As part of the verification process, you may be asked to submit a selfie and/or ID document to prove your identity.</p>	<p>and violations of our Terms and Conditions which increases Drivers' safety.</p> <ul style="list-style-type: none"> • <i>Consent</i> - Your opt-in consent will be required in order for us to proceed with biometric verification checks. 	
<p>To enable, improve and customise the transportation services and other services/features we provide by connecting Passengers with Drivers</p> <p>We help get you to where you want to go. We use Geolocation Data to navigate Passenger pick-ups and drop-offs, calculate estimated time, and track the progress of rides. We match available Drivers with Passengers based on their Geolocation Data to enable efficient pick-up and drop-off, and make the journey and route transparent.</p> <p>Refusing to share Geolocation Data via the Bolt App prevents us from fulfilling the contract with you and means we cannot direct a Driver to your location for pick-up.</p>	<ul style="list-style-type: none"> • <i>Performance of a Contract</i> • <i>Consent</i> - we will require your consent when you use certain features of the Bolt App. For example, if you choose to upload a profile photo on the Bolt App (viewable to Driver's during pick-up). 	<ul style="list-style-type: none"> • Profile Data • Geolocation Data • App Usage Data • Device Data • Communication Data

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Purpose of processing	Legal Basis	Categories of Personal Data
<p>The Passenger's Profile Data is displayed to the Driver as part of the matching process so that they know how to locate the Passenger at their pick-up destination. Communication Data may be processed if the Driver and Passenger need to contact each other to coordinate the pick-up.</p>		
<p>To make sure that your journey goes smoothly</p> <p>We use Geolocation Data to make sure you get to your destination and data on the routes taken during the journey to analyse geographic coverage. This lets us improve recommendations to Drivers about the most efficient routes and facilitate your journey in the best possible way. We also collect App Usage Data to resolve quality issues related to your use of the Bolt App.</p>	<ul style="list-style-type: none"> • <i>Legitimate Interests</i> - It is in our legitimate interests and in the interests of our Passengers to offer you the most convenient journey. 	<ul style="list-style-type: none"> • Geolocation Data • App Usage Data
<p>To make sure the Bolt App works optimally</p>	<ul style="list-style-type: none"> • <i>Performance of a Contract</i> 	<ul style="list-style-type: none"> • Profile Data • Device data

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Purpose of processing	Legal Basis	Categories of Personal Data
<p>We use your Profile Data to notify you of updates to the Bolt App so you can keep using the Bolt services. We also use Device Data and App Usage Data to ensure you can connect to the Bolt App and to help keep your account safe through authentication and verification checks.</p>	<ul style="list-style-type: none"> • <i>Consent</i> - Your opt-in consent is required for the use of Cookies, SDKs, Analytics, and Third-Party Technologies Data. 	<ul style="list-style-type: none"> • App Usage Data • Identification / Verification data • Cookies, SDKs, Analytics, and Third-Party Technologies Data
<p>To suggest new rides and destinations and to schedule rides based on your upcoming events</p> <p>We use your previous journey history, your saved favourite locations (such as home or work addresses) and real time Geolocation Data (even when the Bolt App is closed provided you have consented to 'enable location services in the background') to provide suggestions on new rides. You can always disable these specific notifications, without disabling all Bolt notifications.</p> <p>In addition, after you schedule a ride on Bolt, we will provide an integration with your phone's native calendar app, allowing you to add your scheduled ride to your calendar of choice seamlessly. The Bolt App will be able to detect and extract calendar events from your native calendar app and this includes retrieving event titles, start and end times, and location details. Based on your calendar events,</p>	<ul style="list-style-type: none"> • <i>Consent</i> - Your opt-in consent is required to use real time Geolocation Data and to allow access to your calendar. • <i>Legitimate Interests</i> - It is in our legitimate interests and in the interests of our Passengers to further enrich your journey experience and suggest new features and services. 	<ul style="list-style-type: none"> • Profile Data • App Usage Data • Geolocation Data • Calendar Data

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