



Privacy Policy

ROON is an electric mobility service offered by Contingent progress Ltd., a company incorporated in Cyprus with its registered office at Digeni Akrita, 51, GROUND FLOOR, 1070, Nicosia, Cyprus. ROON operates vehicle rentals according to the model of short-term, self-service eScooter-sharing for registered customers. We established a network of sharing electric scooters (hereinafter referred to as “eScooters”) via a mobile application that allows the customer to locate, rent and operate an eScooter.

The following privacy policy explains the collection and processing of your personal data when using the ROON Service. We take the protection of your personal data very seriously and manage it according to the General Data Protection Regulation ‘GDPR’ (Regulation 2016/679/EU) and the policy laid out in this document. ROON commits to the protection of the privacy of all visitors to our website (www.roon.one) and users of the ROON Service. If you have any questions regarding our policy, please send an email to support@roon.one.

The Privacy Policy applies to the processing of user data by ROON.

1. Who processes your personal data?

The collection, storage and use of personal data is governed by this Privacy Policy and all additional terms incorporated by reference within this document (collectively referred to as the “Policy”), after their acceptance by the user, who has registered for the services provided by ROON. The services, including but not limited to the access and use of the ROON service, are provided only on the condition that the users agree to the present policy as well as the the Scooter-sharing rental terms and conditions (the “Terms & Conditions”) located at www.roon.one.

2. Which type of personal data is collected?

1. User-provided Personal Data

You may provide personal data to ROON during registration and setting up of your user account. The compulsory information collected and stored by ROON during registration are: First Name, Last Name, email, phone number, date of birth and home address.

Furthermore, your debit/credit card data will be processed by ROON’s eCommerce Payment Service provider Stripe, Inc (www.stripe.com): Name of Card Holder, Card Number, Expiration Date and CVC Number.

Our in-app license verification system uses a photo-based process. The user will be prompted to photograph their driver’s license. Additionally, we ask you to take a selfie to verify that the provided documents are yours. The images of the driving license are collected and processed by Veriff for automatic validation purposes. The



driving license may be manually transcribed by our Customer Engagement Team from the images provided by the user during the online registration.

Communication data: any other particular data communicated by the user in the course of their communications with ROON (email or other means) in order to establish contact or resolve any claim with ROON.

2. Usage Data

ROON uses analytical tools to identify how the user reaches the website and social media pages and its subsequent usage. This data is not tied to any personal information, and the user, therefore, remains anonymous.

3. Service Data

Technical Data. The software platform and onboard scooter technology facilitate the fully digital and automated services provided by ROON. Consequently, technical data (time and place of start of the rental, date, time and place of completion of the rental, route, actions performed with the vehicle sensors (seat, stand, switch on /switch off / pause)) is generated by the onboard devices, featuring internet connectivity.

Geolocation Data. Geolocation systems and internet connection devices are embedded in the fleet to monitor the geolocation of all eScooters.

4. Information from other sources

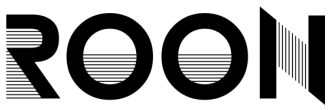
Personal information may be received by ROON from third parties and third party websites (e.g. FB, Instagram, Twitter, etc) according to the policy and terms of the third party. ROON may combine and maintain this data with other personal data we hold about you.

3. For what purpose does ROON collect your personal data?

1. User-provided Personal Data

ROON processes user provided data generally to process the user's requests or transactions, provide information on services, inform about events, promotions and other products we think may be of interest to the user. For instance, we may use the provided information for the following purposes:

- Welcome email and contact about use of services, products or information you requested
- Enable your use of the services
 - Determine service eligibility
 - Credit-worthiness (if needed)
 - These include your driving safety records



- Respond to emails, submissions, comments, requests or complaints
- Confirm, cancel or modify your reservation of the eScooter
- Manage Invoices
- Manage payment of delayed payments
- Manage recovery of potential damages to the eScooter
- Process service payments (Only the Payment Service Provider shall store and process credit card information)

1. Service Data

Technical data collected through connected devices are processed to monitor the state, the performance and the functionalities of the eScooter (e.g. assessing whether battery level is appropriate for further use).

Geolocation data is used to verify the presence of the rented scooter within the service area, at the start and at the end of the rental. This data allows ROON to ensure that the eScooters are situated in their designated areas and are available for booking. The geolocation data is also used to identify the location of the scooter in the event of theft or suspected theft, prevent fraud and/or damaging actions, and provide assistance or emergency medical treatment in the event of an accident.

2. Usage Data

The usage data captured when accessing the ROON website and mobile app is solely processed to permit user's navigation of the site and improve the user's navigation experience. ROON may use this data to adapt the website to ensure an easier and quicker navigation.

Usage data is also processed for the purpose of carrying out anonymous and aggregated statistical analyses.

4. **What happens if you do not provide certain Personal Data?**

If the user fails to provide certain personal data that is necessary for the performance of the scooter-sharing framework contract, to carry out pre-contractual activities, or for the purpose of fulfilling duties and obligations laid down in applicable laws and regulations, ROON may not be able to perform the scooter-sharing framework contract entered into/to be entered with the user. In this case, we may have to cancel our engagement or said agreement. We shall notify if this is the case at the time.

5. **Cancellation of user account**

The user may, at any time, delete his account and the data associated with it. In this case, ROON commits to solely use the said information for blocking obligations imposed by the GDPR. The user may also, at any time, unsubscribe from the payment services, which does not imply the cancellation of the user account.



Cancellations of payment services, user account and newsletter subscriptions, follow independent cancellation processes.

6. How long will ROON retain your Personal Data?

ROON processes your data only for the purposes stated in this Privacy Policy. First of all we need this data only as long as you use our service. At the end of this period, we may, however, be required by law to keep your data for a certain period of time. Even during the use of the ROON service, you may request deletion of your data. However, a deletion is only possible with data, which we do not need for the settlement of the contractual relationship with you or for legally specified archiving purposes or for purposes of proof.

7. How does ROON protect your Personal Data?

We only retain collected information for as long as necessary to provide you with your requested service. What data we store, we'll protect within commercially acceptable means to prevent loss and theft, as well as unauthorised access, disclosure, copying, use or modification. ROON is committed to keep the utmost discretion, confidentiality and secrecy on the private and personal information that the company has access to. ROON implements all necessary security measures as governed by the provisions of the EU General Data Protection Regulation (GDPR), depending on the type of data processed. In order to protect the security of your data during transmission, we use the latest state-of-the-art encryption procedures on our website and when using the app. The data entered by the users are stored on a server. This server is located in Frankfurt am Main and is operated and maintained by the global professional server infrastructure company Amazon Web Services (AWS).

8. Who are the recipients of your personal information ROON collects about you?

ROON may pass on user personal information to the following categories of recipients:

- Authorized personnel of ROON
- Third party service providers that collect data in order to enable ROON to provide its products and services
- Relevant competent authorities to process the payment of fines and/or infringements
- Companies dedicated to the rental of vehicles and / or auxiliary services with which ROON has agreements

Except for the recipients under the categories stated above, no other data transfers are foreseen. The transfer of data will be carried out under strict compliance with the provisions of current regulations on Data Protection.

9. What are your rights with respect to the processing of your Personal Data?



The user can, at any time, exercise the rights of access, rectification, deletion and objection of their personal data held by ROON.

You have the right to obtain information on the personal data stored by us at any time. Please send us an e-mail to support@roon.one. ROON may only process relevant data on your person. If you determine for example, that by exercising your right of information, a date about you is incorrect or has become incorrect, we are in principle obligated to correct it immediately.

ROON processes your data only for the purposes stated in this Privacy Policy. First of all we need this data only as long as you use our service. At the end of this period, we may, however, be required by law to keep your data for a certain period of time. However, if we do not need your data at this time for purposes mentioned in the Privacy Policy, we shall block them. Even during the use of the ROON service, you may request for deletion of your data from us. However, a deletion is only possible with such data, which we do not need for the settlement of the contractual relationship with you or for legally specified archiving purposes or for purposes of proof.

In so far as you are entitled to a legal right of objection in respect of the data processing described in these data protection instructions, we will point out to you at the appropriate place.

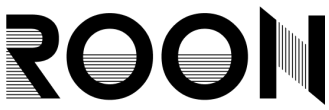
10. **Social Networks**

ROON is present in social media networks. The treatment of the data that is carried out of people who become followers in social networks (and / or perform any link or connection action through social networks) of the official pages of ROON will be governed by this section, as well as for those conditions of use, privacy policies and access regulations that belong to the social network that is appropriate in each case and previously accepted by the user.

ROON will treat your data with the purpose of correctly managing your presence in the social network, informing you of activities, products or services, as well as for any other purpose that the regulations of the Social Networks allow.

Likewise, ROON reserves the right to remove, without notice from the website or the corporate social network, those contents that were deemed inappropriate.

If the user sends personal information through the social network, ROON will be exempt from liability in relation to the security measures applicable to this platform, and the user should, in case of wanting to know them, consult the corresponding specific conditions of the network in question.



11. **Communications and Notifications**

Any communication between the user and ROON will be incorporated into the information system.

Information provided by the user when contacting ROON via email will be collected and processed for the purpose of dealing with the enquiry.

ROON will use your name as well as your email address to send information about exclusive offers at regular intervals. These are, for example, offers on discounted trips. If you are not interested in the offers and benefits communicated via email, you can unsubscribe at any time from our information service. If you have agreed to receive our newsletter separately, you will not receive a newsletter from us in this case either.

Push messages are used to inform the user about the status of the rental. For instance, if the user left the scooter outside of our business areas or forgotten to terminate the rental. If you do not want to receive push notifications, you can disable them at any time in your smartphone settings.

12. **Policy changes and updates**

We reserve the right to occasionally adapt parts of this Privacy Policy that are not in need of consent, so that you always comply with the current legal requirements or to implement changes to our services in the Privacy Policy, e.g. in the introduction of new services. The new Privacy Policy will apply to your re-visit. If your prior consent is required for a change of our services or for the introduction of a new service, we will inform you accordingly in good time and ask for your consent.

13. **Cookies Policy**

On our website, we use “cookies” which are small text files that are transferred from a Web page server to your hard drive. This allows us to automatically obtain certain data such as IP address, used browser, operating system via your computer and your connection to the Internet.

Cookies cannot be used to start programs or to transfer viruses to a computer. Based on the information contained in cookies, we can facilitate navigation and enable the correct display of our websites. No data processed by us will be passed on to third parties nor will links be made to your personal data without your consent. You can disable the use of cookies at any time using your browser’s settings. Please note that certain features of our website may not work if you have disabled the use of cookies.

Information received from third parties with whom we have business relationships, we may combine this information with the other personal data we maintain about the user. In either case, this Policy governs this information.