

PRIVACY POLICY

Last update: December 2019



1. SAFEGUARDING YOUR PRIVACY

At Etergo, we handle your personal data with great care and do everything in our power to protect it. This privacy policy informs you on what data we collect, why we collect it and how we handle that data.

We collect information basically in the following ways:

- 1) When you visit the Etergo website (the "**Website**");
- 2) When you communicate with us;
- 3) When you (pre-)order an Appscooter;
- 4) When you create an account or use our software application (the "**App**");
- 5) When you drive an AppScooter.

2. VISITING OUR WEBSITE

When you visit our Website, usage data is collected automatically through the Website (or third-party services employed in this website). Such usage data can include the IP address, the URI addresses (Uniform Resource Identifier), the name of your computer's operating system and the type of web browser you are using. We also collect information about your click and search behaviour. We use this data to adjust the website and, for example, to make the layout more convenient to you, to change the order of search results, to design certain pages differently. We collect usage data by using various types of cookies (small piece of data stored in your device) and other tracking tools. We collect such data with your consent (if required by law). Consent can be withdrawn at anytime. The retention period of cookies is limited and differs per cookie.

Please read our [Cookie Policy](#) for more information about the cookies we use to improve our Website and business and for marketing purposes.

Social media

When visiting our Website, you may choose to share information from our Website via social media such as Instagram or Facebook. This means that the shared information, with name and interests, can be visible to the visitors of your personal pages. These third parties may use cookies for their own purposes. We do not have influence over how these social media networks make use of your data. For more information regarding the cookies set by the social media networks, please refer to their own privacy and cookie policies.



Newsletter

If you want to be kept up to date on all of the latest Etergo and AppScooter news, events and more, you can subscribe to our newsletter. We need you to fill in your email address to be able to send you such information by email. You can unsubscribe or update your email preferences anytime you want by contacting us. We retain your email address until you unsubscribe for all mailing lists, unless we need it for any of the other purposes mentioned in this Privacy Policy.

3. REACHING OUT TO US

You can contact us in different ways, for example by phone, by using the contact form on our Website or by sending us a message through social media. If you use the contact form on our Website, we ask you to fill in your question, the topic of your question, your email address, your name and your phone number. All this data is necessary for our legitimate interest to get back to you, by either email or phone. Whatever contacting channel you choose, we will only process the data that is necessary for us to get back to you through that specific channel and the data needed to be able to undertake other necessary actions in response to your request.. We will process and store this data for no longer than necessary for processing your question or issue. When the issue is solved, we keep it in a form that does not identify you or delete it. We will retain the personal data relating to your request to us for one year after we have responded to your question or solved the issue that you raised.

4. PLACING (PRE-) ORDER

If you place an order or pre-order for an Appscooter on our Website, we ask you to fill in the details of your order, such as the configuration of your AppScooter, your email address, phone number, address and payment details in order to send you an order confirmation, to process your payment, to keep you up to date with respect to your order and to deliver your order to you. This data is necessary for us to deliver your order.



5. CREATING AN ACCOUNT / USING THE APP

Personal data provided by you, is the data you fill in when requesting any of the services that we offer. Some of our services for users are provided via the App. If you wish to use the App, you must create an account for which you will need to enter certain information so that we can complete your registration. For registration, we need the following data from you: full name, gender, date of birth, phone number, email address, billing & delivery address (address, postcode & city/town).

Unless specified otherwise, all data we ask for is needed to provide you with the service requested by you. In cases where our Website specifically states that providing data is not necessary, you are of course free not to do so. We will delete your account 7 years after your last use of the account.

6. DRIVING AN APPSCOOTER

To further improve AppScooter and safety, to facilitate the (helpdesk) servicing of your AppScooter and to give you insight on your driving behaviour, we will collect certain telematics data regarding the performance, usage, operation, and condition of your AppScooter, including: the customer's name, vehicle identification number; battery serial number; repair history, speed information; odometer readings; location, duration (time and date) of travel; motor status, charge status, battery use management information; battery charging history; lock status, network status, light status, BCM status, drive train status, electrical system functions; software version information; infotainment system data; safety-related data and other data to assist in identifying issues and analysing the performance of your AppScooter. We collect such information either in person (such as during a service appointment) or via remote access. Also, collection of this data enables you to learn more about your driving behaviour. For example: the energy-efficiency of your driving behaviour. To the extent legally required, we will obtain your consent for collection of specific personal data.

We are able to connect to your AppScooter to diagnose and resolve issues with it, and this process may result in access to personal settings in your AppScooter (such as contacts or navigation history). This connection also enables us to view the location of your AppScooter, but such access is restricted to a limited number of personnel within Etergo and only to the extent needed for solving issues with your AppScooter.



7. RETENTION

We will retain information we collect from or about you, our products and our services for the period necessary to fulfil the purposes outlined in this privacy policy, except in case a longer retention period is required or permitted by law. When the information is no longer necessary for these purposes, we keep it in a form that does not identify you or delete it.

8. SHARING DATA WITH OTHERS

We make use of third-party service providers to help us provide our services to you and to run our website. For example, we share your personal data with third party service providers for the purposes of hosting our Website, processing your payment, monitoring and analyzing web traffic, advertising, user database management, remarketing and behavioral targeting, registration and authentication and managing contacts. We never share information without due contracts.

We store your personal data within the European Economic Area (EEA). In principle, your data will not be transferred outside the EEA. However, in the case of some of the non-European service providers that we engage, data processing outside the EEA cannot be excluded. If this is the case, we put measures in place to ensure that this is done in a safe and lawful manner that is fully compliant with the applicable legislation, including GDPR.

9. SECURITY

We do everything in our power to keep your personal data safe. We take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the data. The data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. Etergo employees or third parties engaged by Etergo only have access to your personal data to the extent necessary to perform their task or provide the relevant services. Since all our accounts are password protected, you should be the only person with access to your account. If your login information is stolen or used without your permission, please make sure to contact us immediately (legal@etergo.com) so we can secure your account.



10. YOUR RIGHTS

Your data stays your own and you may at any time choose what you want us to do with it. In particular, you have the right to do the following:

- **Withdraw your consent.** You have the right to withdraw consent where you have previously given your consent to the processing of your data without this affecting the lawfulness of our previous processing of your data.
- **Object to processing of your data.** You have the right to object to the processing of your data if the processing is carried out on a legal basis other than consent. Where your personal data is processed for the purposes of the legitimate interests pursued by us, you may object to such processing by providing a ground related to your particular situation to justify the objection. When your data is processed for direct marketing purposes, you can object to that processing at any time without having to provide any justification.
- **Access your data.** You have the right to learn if your data is being processed by us, obtain disclosure regarding certain aspects of the processing and obtain access to the personal data.
- **Verify and seek rectification.** You have the right to verify the accuracy of your data and ask for it to be updated or corrected.
- **Restrict the processing of your data.** You have the right, under certain circumstances, to restrict the processing of your data. In this case, we will not process your data for any purpose other than storing it.
- **Have your personal data deleted or otherwise removed.** You have the right, under certain circumstances, to obtain the erasure of your data from us.
- **Receive your data and have it transferred to another controller.** You have the right, under certain circumstances, to receive the data you have provided to us in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** You have the right to bring a claim before the competent data protection authority.

Any requests to exercise your rights can be directed to us by email: legal@etergo.com. These requests can be exercised free of charge and will be addressed by us as soon as possible and always within one month.



11. CHANGES TO THIS PRIVACY POLICY

We reserve the right to make changes to this privacy policy at any time by giving notice on our website and/or - as far as technically and legally feasible - by sending a notice to you via any contact information available to us. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom of this policy. Should the changes affect processing activities performed on the basis of your consent, we shall collect new consent from you, where required.

12. QUESTIONS?

If you have any questions regarding the processing of your personal data when using our website and services, please don't hesitate to contact us.

You can reach us at legal@etergo.com or at our office address:

Etergo B.V.
Attn. Legal Department (Privacy)
Koningin Wilhelminaplein 33
1062 HJ Amsterdam
The Netherlands

Etergo B.V. is registered with the Dutch Chamber of Commerce under registration number 62037285.