

Privacy Policy

Effective: January 1, 2021

At JT Cloud Works Corporation and our group companies (collectively “JTCW”, “Ridee,” “we,” “us,” or “our”), we are strongly committed to transparency, and we want you (“you” or “your”) to understand how we collect, use, share and protect your information. This Privacy Policy (“Privacy Policy”) describes how Ridee handles information in connection with Ridee’s websites and related mobile applications and services (collectively, the “Services”), and when you otherwise interact with us.

We reserve the right to change this Privacy Policy from time to time. If Ridee makes changes to this Privacy Policy, the updated Privacy Policy will be made available through our Services and if we make any material changes to this Privacy Policy, we will provide a prominent notice and may also contact you directly by email or another method.

The Types of Information We Collect

We collect or receive information in different ways. The types of information we collect or receive depends on how you use and interact with our Services. In many cases, you can choose the information you provide to us, although certain information is required for us to provide the Services. We use and disclose this information for the purposes described further below. The types of information we collect include:

- Account Information such as your name, e-mail address, telephone number and payment information such as your credit card details. In order to use certain products, we may also require you to provide a copy of your driving license. To avail of Ridee Access, we may also collect government-issued ID for verification purposes.
- We collect and process location data when you sign up and use the Services. For example, to show you Ridee electric kickboards near your location, it is necessary to collect and record the physical location of your device. Data such as the location of the electric kickboards, the routes taken by the electric kickboards, and its rental status are also necessary to provide the Services. Ridee also collects location data directly from Ridee electric kickboards including when a Ridee user is riding, such as journey information.
- If you link, connect, or login to Ridee with a third party service (e.g. Facebook), the third-party service may send us information such as your profile information or friends list from that service.
- When you ask for customer service, support or other assistance, you can choose to provide

us with your contact information so we can better respond to your requests and we may keep information about your engagement with our support services.

- Ridee may collect information from your browser, computer, or mobile device, which provides us with technical information such as your device's source IP address and when you access or use the Services based on your acceptance. We may use cookies and similar technologies (like pixels and tags) to provide our Services, including to remember your settings and to gather analytics information about you.
- We may collect information you share on the Services such as when you participate in communities or other forums, or comment on blog entries. Depending on your camera or photo settings, Ridee will receive information you choose to send us such as photos of parked Ridee electric kickboards.
- We receive information about you when we use third party partners such as marketing and advertising partners.
- To help you introduce people to our Services, you can choose to use our referral service to tell a friend about our Services for a discount. When you choose to use our referral service we may ask for your contact's name and email address and automatically send your contact a one-time email on your behalf inviting him or her to use our Services.

In addition, if you help Ridee collect and charge electric kickboard, we collect additional information:

- details of the work you carry out for Ridee such as information about the electric kickboard you charge for Ridee;
- your bank account details so we can pay you; and
- that which is required by law such as social security number, tax number or work visa.

How We Use Information

We use your information, including information about your location, to:

- provide the Services to you at your request including to manage your account and ride history;
- monitor, track and service the Ridee electric kickboard, including when they are in use by you;
- process payments, subscriptions or donations and any discounts or special offers such as free unlocks;
- communicate with you about your account, interactions or transactions including service-related announcements such as changes to our policies. As allowed by local law, we may also

send to you surveys or marketing communications, including information about features and enhancements to our Services;

- optimize, develop and improve our Services. To do this we may use third party analytics providers to understand how the Service is being used and to help us to improve the Services;
- where necessary, to comply with our legal obligations including to meet regulatory or local law requirements;
- detect, investigate, and prevent activities that may violate Ridee’s policies or Terms of Service or be illegal which may include sharing information with government agencies outside of your home country, such as law enforcement agencies;
- collaborate with third parties such as universities and local government authorities, as described below in the “Who Do We Share Your Information With?” section; and

Who Do We Share Your Information With?

We share your information with Ridee’s affiliated companies, our service providers, other third parties where it is necessary to perform the Terms of Service and as described in this Privacy Policy. In particular we share your information with:

- Our service providers and partners: We share your information with our trusted service providers and partners who provide services to Ridee such as hosting data and our infrastructure, processing payments and donations, supporting and improving the Services, performing customer service, or providing marketing and advertising services. For example, we share information with credit card issuers in order to process your payments and refunds.
- Collaborations with third parties: After removing certain identifiers, such as your name, phone, and e-mail address (where provided), and combining the resulting information with similar information from other users, Ridee may use, sell, license, and share your information, including individual trip records and trip location (journey) history, with third parties for research, business or other purposes. For example, Ridee partners with universities and local government authorities to collaborate on research projects such as understanding traffic and travel patterns in a city. Learn more about these collaborations [here](#).
- Government, regulatory and law enforcement agencies: We may share your information if we believe in good faith that it is reasonably necessary to do so for legal reasons, including to meet federal, state, regulatory or local law requirements or as part of a judicial process or to detect, investigate, prevent, and address fraud and other illegal activity, security, or technical issues or to prevent harm or injury to you, members of the public, our staff, other third parties, or ourselves; or if we need to do so to defend our legal rights or property, to take action regarding illegal activities or traffic offences, or to enforce our contracts, such as our Terms

of Service.

- Ridee affiliates: We may share your information with Ridee affiliate companies to help provide, maintain and improve the Services. As we grow, we may expand our corporate family by establishing local subsidiaries or other affiliates as needed, to help us provide or market the Services.
- Business re-organisation: We may also share your information as part of a sale, merger, change in control, or in preparation for any of these events.

We may also share aggregated, depersonalized, or de-identified information that cannot reasonably be used to identify you with third parties, including the types of third parties listed above.

Our Legal Basis for Using Your Information

Ridee relies on a number of legal bases to collect, use, share, and otherwise process your information for the purposes described in this Privacy Policy, including where:

- it is necessary to provide the Services and perform our obligations in accordance with the Terms of Service. For example, we cannot provide the Service unless we collect and process basic information about you and your location;
- you have provided your consent to us processing your information (in which case you may revoke your consent at any time);
- necessary to comply with a legal obligation, including, for example, responding to government agency or law enforcement information requests or to establish, exercise or defend legal claims;
- to protect vital interests of our users, staff, and members of the public both on and off the Services;
- it is permitted by law, we may process data in the public interest; and/or
- the processing is necessary for the purposes of Ridee's or a third parties legitimate interests, provided that we have balanced these against your fundamental rights and interests.

How We Transfer Your Information

As we offer our Services in many locations, we may transfer your information to or from these locations for the purposes of providing you Services in the service location.

If you are habitually resident in the European Economic Area ("EEA"), Switzerland or the

United Kingdom, we will transfer or transmit your information to the United States and other countries outside of where you live for storage, processing and the other purposes described in this Privacy Policy. The transfer of information is necessary to provide our Services as set out in the Terms of Service.

How Long We Keep Information

We keep your information for as long as is reasonably necessary to provide the Services to you or until your account is deleted, whichever is longer, subject to any longer period as may be required by applicable law or notified to you.

We may ask for a copy of your driver license before you can use certain Ridee Services. When we ask for a copy of your driver's license, we conduct verification checks to ensure the license is valid and we retain only limited verification information in order for you to use the Services.

When you delete your account, it may take us additional time to fully delete your information from our databases and system logs. We may also retain information from deleted accounts to prevent fraud, collect fees, enforce the Terms of Service, to comply with our legal obligations or enforce our legal rights.

EEA/Swiss/UK Rights

If you are habitually located in the EEA, Switzerland or the UK, you benefit from a number of rights in relation to your information. While some of these rights apply generally, certain rights apply only in limited cases. These rights do not necessarily apply to you if you are based outside these regions.

Right to object – Where we process your information based on legitimate interests, you can object to this processing in certain circumstances. Unless we have compelling legitimate grounds or where it is needed for legal reasons, we will cease processing your information when you object.

Right of access – You can access much of your information by logging into your account. You can also request a copy of the information we have about you and information explaining how the information is used.

Right of rectification – You have the right to request that we rectify inaccurate information about you.

Right of erasure – You have the right, in certain cases, to request that we delete your information, provided there are valid grounds for doing so and subject to applicable law.

Right to restrict processing – You have the right, in certain cases, to temporarily restrict the processing of your information by us, provided there are valid grounds for doing so.

Right to data portability – You may have the right to receive certain of your information in a structured, commonly used and machine-readable format and to transmit such information to another controller.

Right to withdraw consent – Where you have previously provided your consent, such as to send you direct marketing, you have the right to withdraw consent at any time. However, this will not affect the lawfulness of the processing based on consent before its withdrawal. Furthermore, even in case of a withdrawal, we may continue to use your information as permitted or required by law.

Your Choices and How You Can Manage your Information We believe you should have choices about the collection, use and sharing of your information. If you do not want Ridee to collect your information, please do not use the Services.

Emails and Other Communications: If you would like to change the types of communications you receive from us, including opting out of promotional communications from us, you may do so at any time by updating the communication preferences specified in your account profile. We may continue to send non-promotional communications such as staffing confirmations, and other information about your use of the Service. If you refer others to us using our email functionality, please note that they may choose not to receive any promotional emails from us in the future by following the opt-out instructions in the email invitation.

Accessing and Managing Your Information: If you have an account with Ridee, you can review, change or delete your information by logging into your account and editing your profile. You can change your mobile phone number or email address by using our in-app change feature. You can delete your Ridee account at any time by submitting a request to us at customersupport@jtcloudworks.com

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