

Privacy Policy

Last modified: February 15, 2021

Effective date: April 20, 2021

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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"), for example, the selling of bikes, Peace of Mind Maintenance and Peace of Mind Theft.

1.1.3 our app (the "App"),

1.1.4 Website, Services and App together are referred to as our "Platform".

1.2 We comply with the General Data Protection Regulation (the "Relevant Legislation") This policy is effective from April 20, 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 and App we process Personal Data and Non Personal Data. "Personal Data" means any information relating to an identified or identifiable natural person as defined in the Relevant Legislation. "Non- Personal Data" is information that is anonymous, aggregate, de-identified, or otherwise does not reveal your identity.

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 can be:

- 4.1.1 the necessity to carry out the agreement between you and us,
- 4.1.2 compliance with legal obligations,
- 4.1.3 your consent,
- 4.1.4 our legitimate interests or the legitimate interests of a third party,
- 4.1.5 a legal requirement to share Personal Data.

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

5.1 When you use our Platform, we need the following contact data. We need these data for your interactions with VanMoof via digital/electronic tools such as e-mail or telephone; for example 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, for marketing purposes, 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
- 5.1.10 Your reference number

5.2 For some orders (for example, 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 may also collect and process the following Non-Personal Data if you use our Platform:

5.3.1 The type of your browser

5.3.2 The operating system that you use

5.3.3 The internet service provider

5.3.4 Website behaviour

5.4 We may 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, e.g. Speed Limit, Total distance, Battery Level.

5.5 After your explicit consent, you allow the App to collect and process Non-personal Bike event data from your bicycle, e.g. Distance, Speed, Battery level, Boost Behaviour, when you are using our Rides feature. We use these data to execute the feature, provide support, improve our services and products and for marketing purposes. The App does not share the Bike event data with third parties.

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.

5.7 After your explicit consent, you allow the App or the Bike, or both, to use location data for explicitly specified features. The App does not share the location data with third parties. VanMoof collects the location data on its servers and uses it for the execution of the feature.

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 pseudonymised for VanMoof B.V. We

do not sell, trade or 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 Personal Data?

9.1 We will not retain your Personal Data longer than is legally allowed, and only as long as is necessary to enable you to use our Platform, 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 and other business partners

We may share your Personal Data with Processors, within the meaning of the Relevant Legislation. We may also share Personal Data with third parties who are not processors, as per contractual obligation, for example, other Controllers who provide services connected to the use of our Platform. With these parties, we make clear agreements about the use and protection of Personal Data. We may share your Personal Data for

example with IT service providers, marketing analytics, advertising platforms, payment platforms, cloud based data warehousing, lease companies and consumer review platforms. They will, for example, store and visualize data, process transactions, and perform marketing activities.

10.2 Others, for legal reasons

We may also share data with VanMoof affiliates, subsidiaries, and partners, for legal reasons or in connection with claims or disputes. We may also share Personal Data if we believe it is required by applicable law, regulation, operating license or agreement, legal process or governmental request, or where the disclosure is otherwise appropriate due to safety or similar concerns.

10.3 Others, with your consent

We may ask for your voluntary participation in online or offline communication about VanMoof, for marketing or informational purposes.

11 Transfer

11.1 The Personal Data that we collect from you is stored within the European Economic Area (“EEA”), but may also be transferred to and processed in a country outside of the EEA. Any such transfer of your Personal Data will be carried out in compliance with applicable laws.

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 VanMoof uses client-side browser storage like cookies. Cookies are text files that your device or browser stores when you visit our website. VanMoof can also use techniques similar to cookies, such as tracking pixels, flash cookies, Java scripts, tags and web beacons. We classify all these techniques under the term Cookies.

Cookies are used to send data from a server to your device or browser for the purpose of

being stored. On a subsequent visit, this data is sent back to the server. This way the server can recognize your device or browser.

We use the Facebook pixel, Twitter pixel, LinkedIn pixel and Google AdWords Remarketing pixel in order to measure the conversion of our advertisements on social media. For general website analytics, we use Google Analytics. We use widgets of Spotify, SoundCloud, Instagram, Twitter, LinkedIn, YouTube, Vimeo and Google Maps to enrich job posts.

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

13.3 By storing cookies we make sure that, for example:

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. Please note that some Website features or services of our Website may not function properly without cookies.

14 Your rights under GDPR

14.1 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 Personal Data yourself;

- 14.1.4 You may file a complaint against processing your Personal 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 Personal Data. In that case, we will no longer process your Personal 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 Update to this notice

- 15.1 We may occasionally update this notice. If we make significant changes, we will notify users in advance of the changes through the Platform or through other means, such as e-mail. We encourage users to periodically review this notice for the latest information on our privacy practices.
- 15.2 After such notice, the use of our services by users in countries outside the European Union will be understood as consent to the updates to the extent permitted by law.

16 Contact information

- 16.1 VanMoof B.V.
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