

## **Privacy Statement - Pon Mobility Services & Retail B.V.**

**Mobility Services & Retail B.V.** considers personal data protection to be essential. We have drawn up this privacy statement to explain how we collect, share, and otherwise use your data. We recommend that you read this privacy statement carefully.

### **1 Who is responsible for the processing of your data?**

In this privacy statement, **Mobility Services & Retail B.V.** (hereinafter: “**Moves**” or “**we**”) describes how it deals with your personal data as a controller when you use the MOVES App (“App”). Where applicable, Moves also describes what data it will share or receive from other (mobility) service providers as part of its own services.

### **2 To whom does this privacy statement apply?**

This privacy statement applies to persons who visit and/or use Moves' website(s) and/or App.

### **3 What is personal data?**

Personal data is information relating to an identified or identifiable natural person. Whether or not certain information can be regarded as personal data also depends on whether Moves has legal means that it can reasonably be assumed to use to identify a data subject.

### **4 Personal data processed by us**

We process your personal data because you provide us with data when you conclude an agreement with us or when you use our services through your employer or privately. As part of these services we will receive data from, and/or may transfer data to, (mobility) service providers as required for the delivery of our services. These third parties are the controllers with respect to the personal data that they process and which they may provide to us. For more information on how these service providers process your personal data and your rights in this regard, please see their respective privacy statements.

#### ***A) Data necessary for you to make maximum use of the App***

Moves' services may involve a variety of mobility services, including, but not limited to, the use of public transport, parking, taxis, publicly available rental bikes, shared cars, shared bikes or shared scooters, and journey registration. If you enter into an agreement with Moves, we will process the following personal data about you in order to make the App available to you and enable use of the App:

- Your name, address, date of birth, personnel reference number used by your employer (if applicable), e-mail address, and telephone number. Depending on the mobility service you use, you may be asked to supply your driving licence details and, depending on the service package chosen by your employer, your bank details so that you can also use the App privately;

#### **B) Data generated when using our services**

If you use the services of Moves or otherwise contact us, for the purpose of delivering our services we will process the following (personal) data – depending on your specific use:

- Data you use to access the App, such as your user name, PIN code and password (we will not, of course, know your password; it will be stored encrypted and not be accessible to us);
- Data about the use of the App tickets issued to you, such as time, location, route, class, and cost of your journey transaction.
- Your communication preferences and settings;
- If applicable, data that we process to give you personalised travel advice in the App, such as time, location, route, and cost of your planned journey transaction.
- Surfing behaviour, recorded on the basis of our own observations or cookies. Examples include data relating to your peripheral equipment, such as a MAC address, an IP address or other number, and the pages you visited;
- Customer satisfaction data such as your answers or feedback to our surveys;
- Data about your use of our customer service.

**C) Data we receive from (mobility) service providers affiliated with us**

If applicable, we will receive data from other providers of mobility services that you can use with the App. We may link data about the use of the App. For example, we may link your check-in and check-out transactions so as to display the journey information in the App. This is also where you can retrieve information about other journeys you have made.

The data that we may receive from other (mobility) service providers and which is necessary for the delivery of our services includes, in particular:

- The time, location, route, class, and cost of a journey transaction.
- Data on the status of a payment including, but not limited to, method of payment, status of payment, direct debit authorisation for an amount to be specified later, or a payment reversal.

#### **D) Data required to identify you for the use of shared scooters or shared cars**

As a user of the App, you can choose to travel using a shared scooter or shared car. In order to ensure that you are authorised to drive these vehicles, we will need to verify your identity and the validity of your driving licence. To make it as easy as possible for you, we will ask you for a copy of your driving licence, to scan it using the App, and then to make a 'selfie'. We will then compare the photo in the driving licence with the selfie by means of a technical analysis in order to establish that the ID shown is in fact your ID.

After making the scan, your citizen service number is immediately automatically covered/masked using artificial intelligence techniques. Your citizen service number is therefore not visible to us. Your signature is only used during the validation of the document to establish the authenticity of the document, we also do not process this in our systems for other purposes. It is also possible to manually cover your citizen service number.

The validation of your identity is carried out by our partner Onfido. Before processing this data, we will ask your consent in the App. We may also have the validity of your driving licence and corresponding driving authorisation confirmed by the Netherlands Vehicle Authority (RDW). We will immediately delete the scanned copy of your driving licence and photo once we have established your identity/driving authorisation. So we will not keep it for longer than is strictly necessary, or use it for other purposes.

If the scanning method described above does not work or you do not want to use it, then we can also check your data with you in another way. You can contact us by video call (which will not be recorded/stored) or visit us on site. To do so, follow the instructions in the App.

For the use of these services, we will take the following details from your driving licence: driving licence number, expiry date, country, and the vehicle class you are allowed to drive. If necessary, we will share the outcome of the verification of your identity and driving authorisation with the specific service that you wish to use. We do all this to prevent you from potentially driving a vehicle illegally or to prevent/recover any damage caused by fraud, theft or other misuse of the vehicles made available to you.

#### **5. Processing: legal grounds and legitimate interests**

The personal data is processed on the basis of the following legal grounds:

1. Consent;
2. Performance of a contract with you;
3. Statutory obligation;
4. Legitimate interests of Moves or a third party.

Legitimate interests include, but are not limited to, safety and security, fraud and crime prevention, IT management, research and analysis of our products or services, business administration, legal affairs, and internal data management.

## **6. Purposes of personal data processing**

We process your personal data with due care. We will only use data necessary to provide our services. Moves will process your personal data for the purposes set out below. The number or numbers given after each of the purposes listed corresponds to the ground or grounds referred to in article 5 of this privacy statement.

### ***A) Purposes for Moves app***

- To keep accounts and records of the use of your Moves app so as to meet financial and tax obligations, including (collective) invoicing and collection of the use of the services via the Moves app [ground 2 or 3]
- To inform and communicate with you and/or your employer and to provide service (such as via the service desk) [ground 2 or 4];
- To process and report to you and/or your employer (through management information) on transactions and journeys made using (mobility) services booked via the Moves app. The information submitted to your employer and the personal data processed for management information purposes will not be directly traceable to you [ground 2 or 4];
- To provide the Moves app user and/or employer with information about the transactions entered into and associated costs. Private transactions and details of business transactions will be visible only to the user [ground 2];

### ***B) General purposes***

- To build up and maintain customer relationships, including maintaining the direct relationships between Moves and its service partners [ground: 2 or 4];
- To offer customer services, including services with regard to the purchase of products and services and dealing with complaints and requests [ground: 2];
- In certain cases, to communicate with service partners from our network in order to proactively contact users in the event of any defect or disruption [ground: 2 or 4];
- To process personal data into internal management information [ground 2 or 4];
- To conduct market research , including measuring customer satisfaction, so as to improve our business operations, brands, products and services [ground: 4];
- To perform statutory obligations, settle disputes. and enforce our rights and agreements [ground: 2, 3 or 4];
- To improve data quality by using address validation technologies [ground: 4];
- To analyse cookies from our website(s). We do this in order to tailor the content of our communications to your personal preferences to the maximum possible extent [ground: 1 or 4].

## **7. No processing of data of persons aged under 16**

We do not intend to collect data from persons aged under 16. We advise parents to monitor their

children's (online) activities so as to prevent their personal data from being processed by Moves. App users must be at least 16 years of age or older.

### **8. Sharing data with third parties**

Moves will share your personal data with third parties in a number of cases for a number of reasons, including those set out below. The number or numbers given after each of the purposes listed corresponds to the ground or grounds referred to in article 5 of this privacy statement.

- If necessary, Moves will share your data with your employer so as to allow your employer to use the data to pay your invoice and to obtain information about your business travel movements. [ground: 2].
- with authorised service partners from Moves' distribution network, for example to ensure a smooth payment process, check the validity of your driving licence, or keep you informed of new products by email. [ground: 1, 2 or 5];
- if we are legally obliged or authorised to transfer personal data to a third party [ground: 3];
- if we suspect a violation of the rights of a third party or a criminal offence or abuse, we may share personal data with third parties that have a legitimate interest in receiving it or with bodies that serve the public interest. These may include enforcement authorities such as the Public Prosecutor's Office or regulatory authorities [ground: 3, 4 or 5];
- with parties that help us deliver our services and which are not data processors, such as payment services providers, accountants or (legal) advisers. [ground: 2, 5];
- for business-economic purposes, such as the sale of business operations [ground: 5];

Moves uses the services of third parties that act as 'processors, including hosting services and research firms, for the purpose of conducting market research or customer satisfaction surveys. If these third parties are to be regarded as processors as defined in applicable data protection laws, Moves will make arrangements with them in writing. These service providers will then process personal data only in accordance with the instructions issued by Moves and under its control.

If personal data is transferred to a recipient abroad, this will normally be a recipient in a country that offers a level of data protection deemed appropriate by the European Commission. If personal data is transferred to a recipient in a country that does not offer an appropriate level of data protection, Moves will ensure that the legally required safeguards are in place. If you wish to receive further information about the transfer of your personal data to countries outside the European Economic Area, please contact Pon's Data Protection Officer (see article 14).

### **9. Analytical, statistical and scientific processing**

We may process your data for market research, for historical analyses to identify data trends and correlations, or to contribute to research for social and/or scientific purposes or to improve road safety.

This data can, for example, be processed to produce real-time information about weather conditions for road safety purposes, or be shared with parties that process information about the quality and

use of roads, for example to combat congestion or for road maintenance. We may share your data with parties within the Pon Group and, where appropriate, third parties for those purposes. This data may comprise travel movements, modes of transport used, times, transfer locations, costs, preferences, customer service contacts or customer satisfaction surveys. We will take appropriate measures (such as hashing, aggregation and encryption) to protect your privacy so that neither the Pon Group nor any third party involved can trace the data directly to you as a natural person (pseudo-anonymous). We process your data on the basis of a legitimate interest. You can terminate the processing of your personal data for the purposes described in this article at any time via the settings menu in the App.

We will keep information about the Moves app, your use of our services, and the number of times that you have contacted us (but not the content of those contacts). This data will be used for statistical purposes. For example, there were 150 contact moments in 2020 on the subject of 'book a journey'.

### **10. Data retention**

We will keep personal data for as long as necessary, for example as long as you are a customer or continue to show interest in the services of Moves. Sometimes we are also legally obliged to keep your data. We use the following terms:

- We store data that we process in order to provide our services to you as long as you continue to purchase the service from us. This concerns data such as your name, contact details and other account information. Data about the bookings and trips you have made will be deleted after ten years.
- We store data that we process when you contact our customer service for as long as you are a customer or for two years at the latest until after the last contact moment. An exception applies here for telephone conversations that may be recorded for training purposes; these will be deleted after a period of 30 days at the latest. An exception can also be made for data related to complaints; these are kept for a maximum of five years after the complaint has been settled.
- We keep financial/tax data necessary for drawing up invoices, contracts or internal reports for at least seven years on the basis of legal obligations.

On expiry of the retention period, Moves will anonymise your data or delete it permanently.

### **11. Website visitor tracking**

When you visit or use our website(s), services, applications, communication services (such as e-mail) and tools, we may use cookies, web beacons and other similar data storage technologies for the purpose of personalising advertisements and offering you a better, faster and safer customer experience. If you do not wish to accept cookies, you can indicate this. For more information about the use of cookies, please see our cookie statement ([www.moves.nl](http://www.moves.nl)). On our website(s) you may find

links to other websites. We are not responsible for how these websites deal with your personal data. Please read the privacy statement of the website that you are visiting.

## **12. Your rights, including the right to object**

You have a right to know what personal data we hold about you and who we share your personal data with. You also have the right to obtain information about the Moves app issued to you. If you have consented to the processing of your personal data, you also have the right to withdraw your consent.

If you wish to access, rectify, update, restrict or delete personal data that we hold about you, or to object to the processing of personal data or direct marketing, or if you would like to receive an electronic copy of your personal data for the purpose of transferring it to another company (insofar as this right of data portability is available to you under applicable laws), then please contact our customer service department. The contact information is provided in article 14. In your request, please be as specific as possible as to the personal data that your request relates to. We will respond to your request as soon as reasonably practical but in any event within the period required by law. Finally, you also have the right to lodge a complaint with the Dutch Data Protection Authority.

You can exercise your rights only to the extent that they are granted to you by law. To check that the request was submitted by you, we may ask you to send a copy of your identification document along with your request. We will ask you to do so only if we deem this to be necessary to identify you, in which case you should obscure your photo, MRZ (machine-readable zone, i.e. the number strip at the bottom of your passport ID page), passport number, and Citizen Service Number. We will destroy the copy of your ID immediately after we have identified you.

## **13. Data protection and data security**

Moves has appropriate security measures in place to prevent misuse, loss, unauthorised access, unwanted disclosure and unauthorised alteration to the maximum possible extent. Moves has technical and organisational measures in place to secure your personal data, including encryption technologies. These security measures are periodically reviewed on the basis of threats.

## **14. Contact**

Mobility Services & Retail B.V. (trading as Moves) has its registered office at Zuiderinslag 2, NL-3833 BP Leusden, The Netherlands, and its principal place of business at Stationsplein 19-A, NL-3818 LE Amersfoort, The Netherlands. If you have any questions and/or comments about this privacy statement, please contact:

### **Moves**

Attn: Customer Care Moves  
Zuiderinslag 2  
NL-3833 BP Leusden  
T: +31 (0)85 808 52 04  
info@moves.nl



Our Data Protection Officer can be reached by e-mail at [privacy@pon.com](mailto:privacy@pon.com) and by post on the above address (attn: 'Privacy Officer').

### **15. Changes**

The way in which we process personal data and the composition and quantity of data we hold are subject to change. We therefore reserve the right to update this privacy statement. If necessary, you will be notified of any changes. This Privacy Statement always shows the most recent revision date.

This statement was last revised on 27-9-2022.