

Bleeper

Bleeper Privacy Policy

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1. Who processes your personal data collected through this website?

1.1 Bleeperbike Ireland Opco Limited, whose registered office is located at 39 Northumberland Road, Ballsbridge, Dublin 4, Ireland (hereinafter referred to as “Bleeper” or as “us”) is responsible for processing the personal data belonging to you (the “user(s)” or “you”). Your personal data refers to any information that would allow us to identify you, either directly or indirectly and which is collected through this website and/or through our IOS or Android mobile application Bleeper.

2. Which type of personal data is collected?

2.1 Usage Data

The navigation on the Bleeper site and applications (as well as the use of any third party application embedded and/or available therein), implies the communication to Bleeper of usage data, which is implicitly acquired during the navigation of the user through the internet communications protocol (“Usage Data”).

Usage data includes among other, the IP addresses or domain names of the devices utilised by the users, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server’s answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilised by the user, the various time details per visit (e.g., the time spent on each page within BleeperActive.com) and the details about the path followed within Bleeper with special reference to the sequence of pages visited, and other parameters about the device’s operating system and/or the user’s IT environment.

Usage data is not collected for the purpose of identifying the user. However, you must be aware that the identification may be possible through further elaborations and associations, as well as with information held by third parties.

2.2 Data communicated by the User

Users are free to navigate the Bleeper site or applications but, to use the service, users need to register and disclose the information requested in the relevant forms in a complete and truthful manner.

Whenever a field is described as “optional” or “not compulsory” or is not marked with “*” symbol it means that the user is free not to communicate the requested data and

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that the registering of the user can go ahead notwithstanding the absence of this information. The data collected by Bleeper for registration purposes on our apps are: first name, last name, date of birth, email address and phone number. In order to use a bike on the Bleeper app, the user must register a valid credit card on their account, this data is processed by our third-party payment provider, Adyen.

User's personal data shall be processed upon user's prior, free and informed consent, and solely for the purposes outlined in the present privacy policy.

The explicit, optional and voluntary sharing of user's email address in the contact forms provided on Bleeper implies that the relevant email address, as well as any other data communicated, is acquired by Bleeper for satisfying the contact request. Users are kindly invited to not share any third-party data unless this communication is strictly necessary for the request made. Users are responsible for any third-party personal data obtained, published or shared through Bleeper and confirm that they have the third party's consent to provide the data to Bleeper.

In addition to the information contained in this privacy policy, Bleeper may provide the user with additional and specific information concerning other services or the collection and processing of personal data upon request.

3. For what purposes does Bleeper collect your personal data?

Through our website and mobile applications, Bleeper provides you with bike sharing rental services. To that end, Bleeper processes personal data that you voluntarily provide to Bleeper for the following purposes:

3.1 Your registration as a Bleeper member and creation of your account.

This processing is necessary to identify you and to prepare and facilitate your future bike sharing use with Bleeper.

3.2 The processing of your order.

To confirm the start of your bike sharing journey.

To confirm the end of your bike sharing journey.

To exchange with you in relation to your booking (e.g. to provide you with information on your booking, to send you reminder notice if you parked a bike incorrectly).

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To manage the payment of arrears.

To manage potential fines.

To manage the recovery of potential damages to Bleeper bikes.

3.3 Payment purposes.

This processing is necessary for the performance of using our bikes via our Bleeper app, which is concluded between you and Bleeper. For the duration of our commercial relationship with you, Bleeper shall retain your credit card information (if applicable to your usage) in order to facilitate your subscription and booking payments.

3.4 Bleeper bike monitoring using vehicle connected devices.

Bleeper provides its bike sharing rental services in a fully digital and automated way through the Bleeper software platform and onboard vehicle technology. As a result, the Bleeper fleet is equipped with devices which feature internet connectivity.

The purpose of such devices and the data collected through them enables Bleeper:

To monitor the state, the performance and the functionalities of Bleeper bikes. For example, this allows Bleeper to verify the location of the bike, lock battery level etc... Such information aims to ensure that each bike is in good working condition and is available for user bookings.

To identify potential breaches of our Terms & Conditions (for example making sure that the user has (1) parked the bike correctly (2) locked the bike etc...);

This processing, aimed at protecting the integrity of the Bleeper fleet, is based on Bleeper's "legitimate interest."

3.5 Bleeper bike monitoring based on geolocation systems and its internet access devices.

As a result, users must be aware that (1) geolocation systems and (2) internet connection devices are embedded in Bleeper's fleet of bikes.

Geolocation systems have been installed by Bleeper to verify the presence of the bike within the correct area in our apps. Such geolocation systems allow Bleeper to

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make sure that the bikes are available for use by users and so that they can be located by Bleeper staff.

Such information shall also be used for the purposes listed below.

To prevent any fraud and/or damaging action against its property as well as to provide users with a better service. For example, geolocation systems allow Bleeper to make sure its bikes are parked within the designated parking zones within our apps.

Location of the bike in the event of theft or suspected theft.

Location of the bike in the event of a suspected accident in order to aid or notify emergency services.

The location of the user is collected solely for the above purposes.

This processing, aimed at protecting the integrity of the Bleeper fleet, is based on Bleeper's "legitimate interest" and is necessary for the services provided between you and Bleeper.

3.6 Improvement of your navigation experience.

Usage Data of the user is solely processed to permit the navigation of the user on Bleeper sites and applications from an operational and technical point of view and to improve the user's navigation experience. Based on such Usage Data, Bleeper will be able to adapt its website to ensure an easier and quicker navigation. For example, Usage Data allows us to make sure the Bleeper website is the most relevant to you depending on your language and country of origin.

3.7 Improvement of Bleeper services based on:

Customer surveys you have completed.

The recording of your bike sharing history to show you carbon emissions saved, distance travelled, and calories burned.

This processing, aimed at having a better understanding of Bleeper members' needs and offering you functions to enhance your experience of Bleeper products/services, is based on Bleeper's "legitimate interest".

3.8 Promotional and marketing activities, upon your consent, namely;

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The sending of email and app notifications for special promotions/deals as well as customised advertisements and promotions that are targeted to your specific interest about Bleeper products/services.

The sending of Bleeper newsletters.

The sending of emails about incorrect parking or about a usage enquiry.

The management of our loyalty program.

The organisation of promotional contests/sweepstakes.

The management and update of Bleeper customers/prospects database.

Direct marketing processing, i.e. any commercial message from Bleeper aimed at promoting Bleeper services, are subject to your express consent.

By exception:

If you are already a Bleeper existing customer and that the message concerns services like those you have already purchased, the underlying processing will not be based on your consent but on Bleeper's "legitimate interest"; and

The sending of transactional emails (concerning for example the updating of our Terms and Conditions) are necessary for the performance of the Contract between you and Bleeper.

3.9 Statistical purposes.

This processing aims at carrying out anonymous and aggregated statistical analyses of the usage data of the customer.

3.10 The management and update of a watchlist of customers presenting certain contractual risks based on;

Bike accidents or repeated damages caused by a Bleeper customer.

Accidents or damages caused voluntarily by Bleeper customer.

Use of Bleeper bikes in breach of our Terms and Conditions.

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This processing, aimed at reducing Bleeper risks exposure in the performance of the of our Terms and Conditions, is based on Bleeper's "legitimate interest".

3.11 The processing of personal data for the purpose of law enforcement.

Should any wilful act of misconduct, fraud or criminal offence perpetrated against Bleeper, personal data could be used, under certain circumstances, for ascertaining individual responsibilities and transferred to competent authorities.

In addition, your personal data may be processed for the purpose of fulfilling duties and obligations laid down in applicable laws and regulations. The user declares to be aware that Bleeper may be required to reveal personal data upon request of the relevant public authorities.

For your full information, Bleeper carries out certain processing of your personal information through "cookies" and other tracers collected every time you visit Bleeper website. This processing is governed by the Bleeper Cookie Policy, which we encourage you to review. You can accept or reject these cookies and other tracers by following the instructions provided in the Bleeper Cookie Policy.

4. Who are the data recipients of the personal information we collect about you?

4.1 Categories of recipients.

Your personal data will be disclosed, as necessary and/or relevant to;

The authorised personnel of Bleeper.

The sub-processors of Bleeper, which are third-party service providers that collect data in order to help Bleeper in providing you with its products/services.

The main IT service providers are;

Google for website analytics.

GoDaddy for hosting services.

SEAT:CODE for the provision of bike telematics data and services.

Zendesk for email and web chat communication.

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SendinBlue for email newsletter.

Microsoft for email communication and productivity systems.

Adyen for the processing of payments.

Bleeper can also disclose your personal data to the extent required by law and/or by competent authorities.

The data communicated is limited to that which is strictly necessary to provide our services. The communication of such data shall be limited to that which is required to allow Bleeper to meet its contractual and legal obligations. Whenever your personal data is shared with a third-party, Bleeper will only do so after entering into a contract with the third-party in which the latter undertakes to protect all personal data using appropriate security measures and not to use that personal data for purposes other than those disclosed above.

4.2 International transfers.

As necessary or useful to provide you with Bleeper products/services, Bleeper may, for the purposes set forth herein, transfer your personal data outside the EU to third parties.

Depending on the case, certain recipients may be located in countries which have been recognised by the European Commission as ensuring an adequate level of data protection or in countries which has not been recognised as ensuring such a level of protection. In any case, Bleeper has put in place appropriate safeguards to protect your personal data, in compliance with the EU regulation no.2016/679 (the "General Data Protection Regulation").

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5. For what period will Bleeper retain your personal data?

Your personal data are retained for different periods depending on the purposes of the processing.

Purpose	Retention Period
Your registration as a Bleeper member and the creation of your account.	For the duration of the commercial relationship. However, please note that: Your registration information and booking history will be archived for a period varying between 6 to 9 months from the moment you have requested the cancellation and deletion of your registration account. Such delay in the deletion and or anonymisation of your personal data shall be strictly limited for the purposes of protecting Bleeper against any fraudulent or criminal activity; information that may evidence a right or that must be kept in compliance with a legal requirement (such as invoices or proof of transactions), may be subject to an intermediate archiving policy for a period of time that does not exceed the time that is necessary for the purposes for which it is kept, in accordance with applicable legal provisions.
Payments	The only information Bleeper can access concerning your payment method via our app and via our website is a token representing the card details of the cardholder. Such payments are processed by our 3rd party supplier, Adyen. However, such information that may evidence a payment is subject to an intermediate archiving policy for a period of 13 months after the effective payment for a credit card and 15 months for a deferred

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	debit card, to be used only if the transaction is disputed.
Bleeper bike monitoring using bike connected devices.	Up to 4 years as from the end of your commercial relationship with Bleeper.
Bleeper bike monitoring based on geolocation systems.	Up to 4 years as from the end of your commercial relationship with Bleeper.
Promotional and marketing activities.	For Bleeper customers, up to 3 years as from the end of the commercial relationship with Bleeper. For prospects, who are not Bleeper customers, up to 3 years as from the collection of your personal information OR as from the last request for information you made.
Statistical Analysis	Up to 9 months as from the end of your commercial relationship with Bleeper.
Cookies	Please check the Bleeper Cookie Policy.
The management and update of a watchlist of customers presenting certain contractual risks, namely: 1) payment incidents which have given rise to legal proceedings 2) bike accidents or repeated damages caused by a Bleeper customer 3) accidents or damages caused voluntarily	3 years as from the occurrence of this event.
The use of Bleeper bikes in breach of our Terms & Conditions.	5 years as from the occurrence of this event.

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6. What rights can you exercise with respect to the processing of your personal data?

6.1 At any time, you can view and / or update your personal profile, you will be able to change your password, update or correct phone number, email address and means of payment.

6.2 As per EU regulation no.2016/679 (the “General Data Protection Regulation”), you can also benefit from the following rights;

6.3 Right of “access”: right to obtain confirmation as to whether your personal data are being processed by Bleeper, and, where that is the case, to access to these personal data and to obtain further information on the characteristics of their processing.

6.4 Right “to rectification”: right to obtain the rectification of inaccurate personal data or, considering the purposes of the processing, the right to have incomplete personal data completed, including by means of providing a supplementary statement.

6.5 Right to “erasure” (or the so-called “right to be forgotten”).

6.6 Right to obtain the erasure of your personal data in certain circumstances.

6.7 Right to “object”: at any time, a right to object to the processing of your personal data to prevent Bleeper from continuing to carry out such processing.

6.8 Where your data are processed for direct marketing purposes.

6.9 Where your personal data are processed on the basis of Bleeper’s legitimate interest. In that case, your request will be satisfied only if you provide Bleeper with a description of that particular situation legitimating your request and save if Bleeper can demonstrate overriding legitimate grounds in light of your particular situation.

6.10 Right to “withdraw your consent”: where the processing of your personal data is based on your consent, a right to withdraw your consent to the processing of your personal data at any time and to prevent Bleeper from continuing to carry out such processing.

6.11 Right to “data portability”: where the processing of your personal data is based on your consent and by automated means, the right to receive the personal data you provided to Bleeper, in an Excel spreadsheet and to transmit those data to a third party.

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6.12 If you wish to exercise any of these rights, please contact us via email at customercare@bleeperactive.com. In addition, in Bleeper's promotional and marketing emails and other communications, Bleeper also includes instructions on how to unsubscribe.

6.13 To protect your privacy and security, we will take reasonable steps to verify your identity before granting access or making corrections.

6.14 As per article 77 of the EU regulation no. 2016/679, you can lodge a complaint about the processing of your personal data with the body regulating data protection in your country if you consider that the processing of your personal data infringes the said EU regulation no. 2016/679.

7. How does Bleeper protect your personal data?

7.1 Bleeper is committed to protecting the information it collects through its website and its apps.

7.2 Bleeper uses appropriate physical, technical and organisational security measures to prevent unauthorised or unlawful processing, accidental loss of or destruction of or damage to your personal data.

7.3 Bleeper systems are configured with data encryption, or scrambling technologies, and industry-standard firewalls. When you send personal information to the Bleeper website over the Internet, your data is protected by the SSL (Secure Sockets Layer) encryption/decryption to ensure safe transmission.

7.4 Any credit card transaction you make through the Bleeper website and app is processed securely by Adyen.

7.5 Their full privacy policy can be found here:
<https://www.adyen.com/policies-and-disclaimer/privacy-policy>

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8. Who to contact when you have a query regarding the processing of your personal data?

8.1 For general queries regarding the processing of personal data carried out by Bleeper please contact customercare@bleeperactive.com

8.2 To exercise your rights (access, rectification, erasure, restriction, etc.) please contact customercare@bleeperactive.com

8.3 For legal notifications: Bleeperbike Ireland Opco Limited, 39 Northumberland Road, Ballsbridge, Dublin 4, Ireland.

9. Changes to this Privacy Policy

9.1 This privacy policy was published on 30th November 20123. In the case of changes to this privacy policy by Bleeper, such changes will be identified by Bleeper on this webpage.

9.2 When a change impacts a processing carried out on the basis of your consent, Bleeper will contact you to obtain a new consent.