

Under The Regulation on harmonised rules on fair access to and use of data — also known as the Data Act, we are required to specify the purposes for which we process your personal data and to have a legal basis to collect, use, share, and otherwise process information about our users. If you habitually reside in the European Economic Area, Switzerland or the United Kingdom, you have certain rights available to you. Some of these rights apply generally whereas other rights only apply depending on the legal bases Penny relies on to process data.

## Legal Bases

Effective: Sep 25, 2025

### To provide the Penny Services

As described in the [Terms & Conditions](#), the Services cannot be provided, and the user agreement cannot be performed, without Penny processing data about you including location data. For example:

- We need information about the location of any moped while you are riding it and the routes taken by the moped in order to provide the Services to you.
- We may share information with Integrated Partners so you can access the Penny Services via their app.
- We communicate with you about your account, interactions or transactions including service-related announcements such as changes to our policies.

### With your consent

We ask for your permission to process your information for certain purposes and you have the right to withdraw your consent at any time. We rely on your consent in the following situations:

- With your explicit consent, we will use our facial recognition technologies to verify that the driver's license provided matches the selfie you upload. The facial recognition technology used for this implicates data with special protections under EU law, you can learn more about how we use facial recognition technology [here](#).

- Where required by applicable law, to send you marketing communications.
- When you link, connect, or login to Penny with a third-party service (e.g. Facebook). Such information may include your account ID or "handle" and information that you make available to us on that page or account.
- To receive information through the device-based settings you enable (such as access to your camera or photos), so we can provide the features and services described when you enable the settings.

On other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.

When we process the data you provide to us based on your consent, you have the right to withdraw your consent at any time.

## Legal obligation or for the establishment, exercise or defence of legal claims

We share and otherwise process information where we have a legal obligation to do so. The categories of data will depend on the specific factual circumstances but could include sharing your account information, such as Penny user identifier, name, email address, telephone number, date of birth, driver's license, trip data and location data. Where legally required, we share information:

- Where we're responding to valid requests from law enforcement and other government agencies for certain user information.
- We may be required to process your information to verify your driver's license or identification, including to manage insurance, or to take action regarding illegal activities, traffic offences or violation of our [Terms & Conditions](#).
- We may also have a legal obligation to share certain user information including account, journey and location data with cities, local authorities and public transport operators where necessary to fulfill conditions of the permits or licenses granted by these authorities to us.
- In addition, processing may be needed for us to establish, exercise or defend civil or criminal claims in connection with actual or potential litigation including to protect our Services, our property or other legal rights, including those of our users.

## To protect vital interests

We process data where it is necessary to protect an interest which is essential to someone's life or to protect any person from serious injury. The categories of data and processing involved will depend on the specific factual circumstances, for example this could include processing information to combat harmful conduct both on and off of our Services.

## Carrying out a task in the public interest

Where envisaged by EU law or the law in an EU Member State, Switzerland or the United Kingdom, we may process data in the public interest. This may include protecting against harm and undertaking research for social good and typically, the categories of data and processing involved will depend on the specific factual circumstances.

### For the purposes of our legitimate interests

We process your information where it is necessary for our legitimate interests, or those of third parties, while applying appropriate safeguards that protect your privacy, rights and interests. We do this to:

- Manage our fleet of Penny vehicles including to; ensure availability, to monitor usage levels and track battery charge levels. It is in our interest to provide vehicles which are in good working order and to protect our property from damage or theft.
- Collect images such as the helmet selfies and/or video footage via cameras on certain Penny vehicles (if applicable), such as mopeds. It is in our (and your) interests to confirm you wear (and continue to wear) appropriate protective gear and are riding in a safe manner.
- Show and personalize the advertisements you see based on information you provide to us and our advertising partners. It is in our interest to support and fund our business and to ensure the content user's see is relevant to them.
- Collaborate with third parties where it is in our legitimate interests to support and fund our business, we share aggregated rider data as high level insights to pursue research and business projects. To do this, we remove certain identifiers, such as your name, phone, and e-mail address (where provided), and combine the resulting information with similar information from other users. We may use, license, or share such information with third parties for use by third parties for research, business or other purposes. For example, sharing ridership information

with a consulting company in support of their consideration of zero-emissions areas in certain geographies.

- In the interests of the communities we serve, cities, local authorities and the public generally, we share aggregated or anonymized rider data with cities, local authorities and universities for research purposes, including to enable them to better understand the general flow of people and traffic across their streets over time.
- Improve our Services by conducting research or analytics such as what services or products users want, how users would like us to improve our Services and identify any issues so we can improve your navigation experience and those of other users. It is in Penny's (and our users') interest to offer an innovative and accessible service. We may also, where necessary in our legitimate interests, use your information including the helmet selfies uploaded by riders to create and train our machine learning models to improve the accuracy of the helmet detection software.
- Keep the Services safe and secure by using information to detect, prevent or investigate violations of our [Terms & Conditions](#) fraud, illegality or abuse, and to prevent, detect or investigate unauthorized use of Penny vehicles. It is in our and our riders' interests to take steps to provide a safe and secure service.
- Share information with third parties, including law enforcement and other government agencies (such as cities and local authorities) to detect, prevent or investigate violations of our [Terms & Conditions](#), fraud, illegality or abuse, and to prevent, detect or investigate unauthorized use of Penny vehicles pursuant to their legitimate interests in investigating, prosecuting and preventing crime.
- Promote the Services, including advertising the Services to you on third-party services (including social networks) and to conduct marketing campaigns, to tell you about the various services we offer or to send you promotions. It is in our interests to promote the Services and in rider's interests to receive special offers and promotions such as free unlocks.
- Understand and respond to your feedback. It is in the interests of our users to respond to their requests, resolve issues and prevent bad experiences.

You have the right to object to, and seek restriction of, our processing of your personal data based on our legitimate interests. You can exercise your right to object by emailing us at [support@pennyrent.zendesk.com](mailto:support@pennyrent.zendesk.com)