

Effective Date: [February][●], 2021

E-RYD Mobile Application

Privacy Policy

This Privacy Policy (“**Policy**”) describes how [ESCUT GROUP LLC] (“**Company**” or “**we**” or “**our**” or “**us**”) treats information collected or provided in connection with an end user’s (“**you**” or “**your**” or “**user**”) use of the [E-RYD] mobile application (the “**App**”) in connection with your use of [electric vehicle - sharing] (each a “**Service**”) operated by [ESCUT GROUP LLC], some of which may use Ellipse bike locks (each, a “**Lock**”). This Policy is intended to give you notice of how your Personal Data (as defined below) will be processed, collected, used and shared as you use the App. This App is designed, operated by and maintained by Velo Labs Inc. (“**Velo**”), a service-provider to the Company. Please note that your use of the App constitutes your acceptance of this Policy as set forth below:

1. Collected Information. The information collected during your use of the App includes the following:

(a) Submitted Information. As part of using the App, you may submit certain information to us. For example, the App collects your name, email, and mobile phone number when you register for an account on the App. You may also submit to us through the App other information such as your itinerary for a planned bike ride. To the extent you decline to share certain information with us, we may not be able to provide some or all of the features and functionalities found on the App.

(b) Automatically Collected Information. When you use the App, it gathers data, including personal information relating to an identified or identifiable natural person (“**Personal Data**”), from you, and this information can be associated with your user account and information you submit to us. This includes usage information, such as information on when, how often and for how long you use the App, as well as server log data such as your device type, and operating system.

(c) Analytics. Third party analytics service providers may receive data regarding your usage of the App in order to provide analytics services to us. In particular, the App uses services provided by Crashlytics to analyze usage of the App. For information on Crashlytics’ privacy practices, you can review Crashlytics’ privacy policy linked at <https://firebase.google.com/support.privacy>. If you elect to opt-out of data collection by these service providers (to the extent available) and subsequently use the App through a different device or otherwise change your cookie or privacy settings on your device, you will need to opt-out again.

(d) SDKs and mobile advertising IDs. Our Services may include third-party software development kits (“SDKs”) that allow us and our service providers to collect information about your activity. In addition, some mobile devices come with a resettable advertising ID (such as Apple’s IDFA and Google’s Advertising ID) that, like cookies and pixel tags, allow us and our service providers to identify your mobile device over time for advertising purposes.

(e) Location Information. With your permission, the Company and Velo will receive your precise physical location (i.e. GPS data) when you are using the App through your mobile device. This location information will be used and disclosed as specified below.

2. Use of Information. We use the information we collect about you (which includes all information outlined in section 1 above) for a variety of purposes. Our legal bases for processing your Personal Data are: 1) our legitimate interest in running and maintaining our business; 2) performance and fulfillment of

our contracts, including but not limited to our contracts with Operators; 3) your consent; and 4) compliance with our legal obligations. In many instances, more than one of these legal bases apply to the processing of your Personal Data.

(a) Provision of Services. We may use collected information for the purposes for which you provided the information including, for example, to create and maintain an App account for you, to process your rental of a bicycle from an Operator or to respond to a question that you e-mail to us. We also use the collected information as necessary to provide the features and functionality of the App to you. We may also use the information we collect about you to count and recognize App users, and to manage our business.

(b) Updates and Troubleshooting. We may also use the collected information to contact you regarding updates or modifications to the Service, to help troubleshoot problems, or alert you to changes in our policies or agreements that may affect your use of the Service or the App.

(c) Personalized Content; Improvements. We may use the collected information to personalize the content that you and others see based on personal characteristics, preferences and/or your location for the effective provision of the Services. We may also analyze collected information relating to your use of the App in order to help us improve the App and develop and improve other products and services. We may also use the collected information to create new products and services.

(d) E-mail Information and Offers. We do not currently use your e-mail address to send you marketing communications or offers. We only use your e-mail address to send operational emails, including but not limited to verification codes for sign-in and ride receipts. We will not provide your Personal Data to third parties for their own marketing purposes without your consent.

(e) Location Information. In addition to other uses of collected information outlined in this Section 2, we may use information regarding your physical location to provide you with information on nearby bicycles (or other vehicles) available for rent through Services and provide other features of the App to you which are dependent on knowing your location (whether statically or over time), such as features calculating distance traveled or speed.

(f) Combination. In limited circumstances, we may combine Personal Data collected through the App with other information that the Company collects about you in other contexts. In these contexts, we will handle the combined information in a manner consistent with this Policy.

(g) Aggregated and deidentified information. From time to time, we may also share aggregated or deidentified information about App users, such as by publishing a report on trends in the usage of the App. Such aggregated or deidentified information will not identify you personally.

(h) As Required by Law. We may use the information that we collect about you to comply with legal and/or regulatory requirements.

3. Disclosure of Information. We share and disclose the information we collect about you as follows:

(a) The App. When you register for, use or otherwise interact with a Service through the App, we may share all information provided by you or otherwise relating to that interaction with Velo for the provision of the Services. Please note that Velo's further use or disclosure of your information is governed by Velo's privacy policies and practices. We encourage you to contact Velo and asking for information regarding such policies and practices.

(b) Third Parties. We may use contractors and third-party service providers to assist us in the operation of the App, to assist us in achieving the purposes discussed above. This may include service providers who assist us with providing customer service and e-mail newsletter management. Such third-party contractors or service providers may obtain access to the information you provide, including Personal Data. In addition, the App may allow you to authorize us to provide other third parties with information about you in certain circumstances.

(c) Aggregated Information. We may provide advertisers and other third parties with aggregated, anonymized information about our user base and its interests and usage patterns. This may include making available or publishing aggregated, anonymous data regarding activity on this App, including without limitation in relation to location data.

(d) Business Arrangements. We may disclose anonymized information to third-party partners in furtherance of our business arrangements with them, including without limitation to jointly offer a product or service to you or create interoperability between our products and services and the products and services of such partners.

(e) Legal Requirement. We will use and disclose any information where we, in good faith, believe that the law or legal process (such as a court order, search warrant or subpoena) requires us to do so or in other circumstances where we believe it is necessary to protect the rights or property of Company, our users and/or third parties.

(f) Interest-based Advertising. The App may include advertising served by third parties, at the option of the Company, which may be targeted to you based on your App usage and the information collected through the App about you. For more information on such advertising targeting practices, including privacy and confidentiality, you may visit <http://www.aboutads.info>. For the ability to opt-out of such targeting practices, you can visit <http://www.aboutads.info/choices/> and also download and use the apps referenced at <http://www.aboutads.info/appchoices>.

The use of online tracking mechanisms by third parties is subject to those third parties' own privacy policies, and not this Policy. If you prefer to prevent third parties from setting and accessing cookies on your device, you may set your device to block cookies. Additionally, you may remove yourself from the targeted advertising of companies within the Network Advertising Initiative by opting out [here](#), or of companies participating in the Digital Advertising Alliance (with regard to browsers) by opting out [here](#).

4. Effective Date; Changes. This Policy applies to all information collected by or provided to us on and after the Effective Date. When we make any material changes to this Policy, we will change the Effective Date. We will treat your continued use of the App following such change as your acceptance of the changes.

5. Third Parties. The App may contain offers from third parties or links to third-party websites at the option of the Company. This Policy does not apply to information that you may provide to or that may be collected by third parties. We encourage you to request such third parties to provide you with their applicable privacy policies and other terms and conditions before engaging with or making a purchase from such third parties.

6. Viewing, Amending and Deleting Information. You can log into your account and view, amend or delete your account information at any time. Please note that while changes to your profile information are reflected promptly in active user databases, our servers may retain previously provided

information, including your user ID, e-mail address and the date you deleted your account. Deletion of a mobile device application from your device or deletion of your App user account will not result in the deletion of location data from our servers.

7. Security. We employ physical, technical, organizational and administrative procedures to safeguard the Personal Data we collect. The Personal Data we collect about you is stored in limited access servers. However, no security measures are 100% effective and we cannot guarantee the security of your Personal Data. We expressly disclaim any representation or warranty, whether express or implied, with respect to ensuring, guaranteeing or otherwise offering any definitive promise of security in connection with your Personal Data or usage information.

8. Data Retention. We retain Personal Data about you necessary to fulfill the purpose for which that information was collected or as required or permitted by law. We do not retain Personal Data longer than is necessary for us to achieve the purposes for which we collected it. When we destroy your Personal Data, we do so in a way that prevents that information from being restored or reconstructed. Note that the Company will maintain your e-mail address for use to send you our newsletter and/or promotional materials, provided that you can always opt-out of receiving such messages in accordance with instructions provided in such messages.

9. Children Under 13. Content on our App is directed at individuals over the age of 18. We do not knowingly collect information from children under 13 and the App is not directed at persons under 13. If you are a parent and believe your child under the age of 13 has used the App and provided Personal Data to us through the App, please contact us at the phone number and address provided in Section 11 of this Policy and we will work to delete that App account and any such Personal Data.

10. Transfer as Corporate Asset. In the event of a merger, sale of capital stock or assets, reorganization, consolidation or similar transaction involving Company, the information we possess, including Personal Data, shall be transferred as a corporate asset to the acquiring entity, provided that such entity will continue to handle such information in accordance with this Policy and applicable law.

11. Transfer to the U.S. or Other Countries. The Company is based in [United States of America]. [Your information will be stored and processed in the United States or other countries where [ESCU T GROUP LLC] has facilities.] By using the App, you consent to the transfer of information outside of your country, even if your country has more rigorous data protection standards.

For users in the European Economic Area (“EEA”), the personal data we transfer to Velo will be transferred from the EEA to Canada, which received an adequacy decision in 2001 from the European Commission for the protections provided by the Canadian Personal Information Protection and Electronic Documents Act. Any onward transfers will be made in accordance with applicable law, including EU General Data Protection Regulation.

For the purposes of processing the Personal Data of EEA data subjects, we act as Data Controller .

If you are a resident of the EEA, you have certain rights available to you under the General Data Protection Regulation (“GDPR”). These rights are:

- The right to be informed about our data collection practices;
- The right to access and rectify your data;

- The right to erase your data;
- The right to data portability;
- The right to restrict and object to the processing of your data (including for direct marketing purposes); and
- The right to withdraw your consent (to the extent applicable).

To exercise any of the rights listed above, please contact us via email at [admin@electricridehtx.com]. We will respond to your request within thirty (30) days of receiving the request.

You also have the right to lodge a complaint with a supervisory authority. The EU Commission provides a list of supervisory authorities here: http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

12. Contacting Us. If you have any questions about this Policy, please contact us at [+1(832)677-8297] or at: [admin@electricridehtx.com]

[E-RYD].

Attn: Privacy Questions

[2525 South Voss Rd, Apt 173, Houston TX 77057]