

PRIVACY POLICY OF COMODULE GMBH [Friedrichstr. 68, 10117 Berlin, Germany]

The protection of your privacy in the processing of personal data is an important concern to which we pay special attention in the context of our business processes. We handle personal data collected during visits to our websites and/or during using our mobile applications confidentially and entirely in accordance with legal regulations.

Herein, personal data is information about an identified or identifiable natural person and processing means any automated or manual operation performed on personal data (e.g. collection, recording, organization, structuring, storage, adaption, alteration, erasure, destruction, etc).

Comodule GmbH acts as data *controller* in respect to all users of COMODULE applications and as principle *processor* of collected data. This means that we will determine the purposes and means for processing the personal data that is being collected from you. We only use data in ways relevant to carrying out our business and services.

COLLECTION AND PROCESSING OF PERSONAL DATA

Our summarised principles for processing personal data are as follows:

- Collected personal data will be adequate, relevant and limited to above stated purposes
- Collected personal data will be kept accurate and up to date
- Personal data is processed fairly, lawfully and in a transparent manner
- Personal data is processed only for limited, specified and lawful purposes
- Unnecessary data will be deleted
- Appropriate organizational and technical security will be ensured, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage
- Personal data will transferred to other countries with matching protection levels and entities ensuring matching protection levels to such data.

We process sensitive personal data only with the explicit and unambiguous consent from the user to whom the data relates, when needed for the protection of life, health or freedom or to fulfill applicable laws and regulations or contractual obligations.

We process personal data only based on legitimate grounds of:

- With explicit and unambiguous consent of the user to whom the personal data relates
- Where necessary, to manage user relationship and all pre- or post customer relationship activities,
- To protect legitimate interests and rights of the user to whom the personal data relates
- To our protect legitimate interests and rights
- To fulfill applicable laws and regulations or contractual obligations

We will collect and process personal data solely for the purposes of the registration for and use of the functions and/or the processing of orders. When you register for our services, you will, upon the logging in of your submitted contact details, indicate your consent to our collecting, processing and using this data and also the master personal data voluntarily provided by you in the context of the use of the available services, to the extent necessary for the provision of the contractually stipulated services. You also confirm that all the personal data provided to us is correct and up-to-date and you are taking an active

obligation to update any item of personal data as soon as submitted data becomes incorrect, outdated or misleading.

You may revoke your consent hereto at any time. The updated information and revocation may be communicated via e-mail to support@comodule.com. The revocation results in your account being deleted from the system. Users may also instruct us to block or delete the data relating to their user accounts, and thus their personal data, at any time. The customer has the option of deleting his/her account on our mobile application, which will have the effect of automatically deleting his/her personal data from our system. Data which is no longer required will be deleted after 30 days or, at the latest, upon the expiration of the statutory retention period/deadline. Only such personal data required by us for the completion of outstanding tasks or the enforcement of our rights and also any data which we are obligated to retain in accordance with statutory regulations will not be subject to deletion. Accounts are automatically deactivated if they have not been used in 24 months (which is determined on the basis of the user's most recent login). Personal data is automatically deleted at the time of deactivation, taking into account the legal retention period.

In case a user wishes to access or rectify or erase its personal data, please contact support@comodule.com. Please also note that you have the right, at any time, to restrict or object to processing your personal data by also contacting support@comodule.com. COMODULE will refrain from fulfilling such requests only if it is in the interest of prevention or investigation of criminal offences, in the interest of material rights and freedoms of a third party or prohibited by competent authority or under court ruling.

Please note that if you have any complaints you are advised to file them to support@comodule.com and/or to a competent supervisory authority.

USE OF COOKIES

COMODULE uses cookies and active components (e.g. JavaScript) to track visitors' preferences and optimally tailor the design of the websites to those preferences. Cookies are small text files stored on your computer when you visit our website. If you like, you can delete the cookies at any time. However, this can result in some functions no longer being available. For information on deleting the cookies, please consult your browser's help function.

The use of cookies during the registration process and in the course of the provision of our services first of all enables us to identify users who return as customers to our website after an initial visit. Furthermore, we can use cookies to optimize our range of services in line with users' individual requirements. We also use cookies as a means of chronicling both the statistical frequency of visits to the various parts of our website and general navigation-related aspects, and also for the creation of pseudonymous profiles, where applicable (see above).

USE OF THE GOOGLE ANALYTICS WEB ANALYSIS TOOL

Our website uses Google Analytics, a web analysis service provided by Google Inc. ("Google") which uses so-called "cookies", text files which are stored on your computer and enable us to analyse your use of our website. The information relating to your use of this website generated by the cookies is generally transmitted to a Google server in the US, where it is stored. However, if you have activated the IP anonymization function on this website, Google will truncate your IP address within the member states

of the European Union or in other states which are party to the Agreement on the European Economic Area before this transmission occurs. Your full IP address will only be transmitted to a Google server in the US before being truncated in exceptional cases.

Google will use the information in question on behalf of the operator of this website in order to evaluate your use of the website, to compile reports on your website activity and to provide other services connected with the use of the website and the Internet to the website operator. The IP address transmitted by your browser in the context of the Google Analytics function will not be consolidated with other data from Google.

You can prevent the saving of the cookies by selecting corresponding settings of your browser's software. However, we wish to point out that, if you do so, you may not be able to fully use all of the functions of this website.

USE OF SOCIAL PLUG-INS AS PART OF SOCIAL MEDIA

COMODULE uses social plug-ins from the social network Facebook.com, which is operated by Facebook Inc., Palo Alto, CA, USA ("Facebook"). The plug-ins are identified with the Facebook logo or the suffix "Facebook social plug-in". When you visit a page on our website that contains such plug-ins, these buttons are initially disabled. The plug-ins will not be enabled until you click on the button provided. These buttons will only be activated and establish a connection to the social network in question upon their activation by the customer, who thereby indicates his/her consent to the transmission of his/her data to the operator of that network. If you are logged in on Facebook, Facebook can link your visit to your Facebook account. If you click on the relevant button, the corresponding information will be transmitted directly to Facebook by your browser and stored there. For information on the purpose and extent of the collection, further processing and use of data by Facebook, your rights in this regard and the optional settings for the protection of your privacy, please refer to the Facebook Data Use Policy. Should you not wish Facebook to collect data about you via our website, you should log out of Facebook before visiting our website.

USE OF EXTERNAL LINKS

COMODULE websites may contain links to third-party websites operated by providers that are not associated with us. After you click the link, we no longer have any influence over the collection, storage, or processing of any personal data transmitted to third parties upon your clicking of the link (such as the IP address or URL of the page that contains the link), as we naturally do not have any control over the behaviour of third parties. Therefore, COMODULE cannot assume any responsibility for the processing of such personal data by third parties.

USE OF PERSONAL DATA AND PURPOSE SPECIFICATION

a) Master data

We collect and process personal data upon your registering and opening a user account with us. As a general rule, when you open a user account, we will first of all request the following personal data (hereinafter referred to as "master data") from you:

- Name,
- E-mail address,

- Password (this password will be saved in an encrypted form and will not at any point be visible in plain text),
- Gender,
- Date of birth.

On the one hand, we require master data in order to manage and process our customers' user accounts and in order to be able to contact our users if and as necessary. On the other hand, master data is required in order to enable us undertake the user agreement and any other agreements. Personal data entered on the contact form is collected for the purposes of enabling us to respond appropriately to any enquiries. We will retain your master personal data as long as is necessary for our purposes. Thereafter, it will be deleted from our system.

b) User data

In addition, we collect the following data in the context of the provision of our services:

Personal data:

- Position-related data (GPS data)
- IP address
- Drive unit data
- Battery data
- Display data
- E-bike manufacturer and model
- An address which enables direct navigation (voluntary disclosure)

Technical data:

- Speed
- Heart rate
- Watts
- Distance
- Battery level
- Pedaling cadence
- Calories
- Torque
- Browser tracking data

The personal and technical data collected ensures that users are able to avail themselves of our services. The purpose behind the collection of such data is to provide users wishing to make use of the features, and depending on their particular requirements, with information about their e-bikes and also about e-bike rides and activities. COMODULE retains and uses anonymous personal data in order to develop and improve applications in line with users' requirements. We reserve the right to evaluate the data on an anonymous basis, to publish it on the platform in the form of statistics and to otherwise use the data.

Other purposes for processing personal data are:

- (a) securing compliance with the applicable legal, regulatory or professional requirements;

- (b) for processing requests and communications from competent authorities;
- (c) user relationship administration, financial accounting, internal compliance and risk procedures, and client relationship purposes;
- (d) utilization of systems and applications (hosted or internal) for information technology and information system services.

Collected personal data will be kept only as long as it is necessary for the purposes the data was gathered. Once the purpose is no longer relevant, the data shall be deleted or transformed into anonymous data for statistical, historical research and product and services development purposes. Information that COMODULE must retain under the law

SECURITY

We implement appropriate technical and organizational measures to ensure that your data managed by us is protected against tampering, loss, destruction, access by unauthorized persons, or unauthorized disclosure. Our security measures are being continuously improved in accordance with the state of technological developments.

ADVERTISING

We use the so-called double opt-in procedure for the distribution of our newsletter, i.e. you will only receive a newsletter once you have confirmed, by clicking on a link contained in our e-mail alert, that the newsletter service is to be activated. Should you no longer wish to receive newsletters or any other advertising materials from us, you may decline this service at any time. Written notification (e.g. via e-mail) of this revocation will suffice. Every newsletter will of course also contain a link enabling you to cancel your subscription.

DISSEMINATION OF PERSONAL DATA TO THIRD PARTIES

With account registration users provide a general authorization to us to engage the third parties to act as further *processors* of the personal data.

We may make available your personal data to another affiliate within COMODULE group, that is data will move between different entities in different jurisdictions. This may be done due to division of business functions between different entities. All personal data protection and processing obligations as well as liability on Comodule are in that case extended to such other entity receiving and processing the personal data.

We may make your personal data available to third parties for processing them on our behalf. All personal data protection and processing obligations as well as liability on Comodule are in that case extended to such other entity receiving and processing the personal data.

We may make your personal data available to third parties who are providing services to users of Comodule applications. The disclosure of personal data which may be made available to such third parties will be on a voluntary basis. We will, in the context of the provision of the services in question, make the data voluntarily disclosed available to those users with access privileges in the designated parts of our website. Anonymous position-related data (GPS data) will be transmitted in the context of the tracking function to routing and navigation service provider with a view to extending and improving the

cartographical materials. All personal data protection and processing obligations as well as liability on Comodule are in that case extended to such other entities receiving and processing the personal data.

If you and a third party service provider have agreed on additional terms and conditions, such will apply unless to the extent they do not conflict with our legal obligations and business interests.

We undertake to secure that third parties will process personal data only on the following terms:

- Processor will process personal data only under our the instructions
- we take reasonable steps to secure that the third party complies with same legislation and requirements as applicable to us
- Processor will be obligated to promptly inform us of (i) any failure to comply with necessary requirements, (ii) in case there has been a breach or attack to the security of the personal data, (iii) processor will submit its processing facilities to be audited by us on reasonable request to demonstrate its compliance with all applicable requirements.

As a general rule, you the user will decide what personal data may be disseminated to third parties. We may only disseminate a user's personal data to third parties if and to the extent that (1) this is necessary in order to enable us to implement the contract concluded with the user, (2) we are legally obligated to do so or (3) this is necessary for the enforcement of our rights and claims. In the event that a user's personal data is to be disseminated for purposes other than those specified herein, we will obtain the user's consent thereto in each individual case. We will not disseminate any personal data to third parties without such consent.

REVOCACTION OF CONSENT

You can also revoke your consent to the collection, processing, and use of your personal data for the future. Personal data will be deleted in the event that you revoke your consent to its retention where knowledge thereof is no longer required to achieve the purpose formerly served by its retention or where its retention is impermissible on other statutory grounds. This will not affect data which is required for billing and accounting purposes or which is subject to statutory retention obligations. Please address your revocation to: COMODULE GmbH via e-mail to support@comodule.com

CHANGES TO THIS DATA PROTECTION POLICY

We reserve the right to amend our data protection policy from time to time. You will be informed of any substantive changes made. Furthermore, we will archive copies of our previous data protection policies for reference purposes.

CONTACT

To obtain more information or to submit suggestions or complaints regarding the processing of your personal data, you can contact us at support@comodule.com. If incorrect information has been stored despite our efforts to maintain correct and up-to-date data, we will correct this upon your request.