

## Privacy Policy

Bout Oy Ab (later “Bout” or “we”) collects and processes personal data of our users such as passengers and captains, potential users as well as other users of our services (including our website and social media services) and our business partners (later: “you” or “user” or “data subject”). We are committed to being transparent about how we collect and use that personal data as well as meeting our data protection obligations.

This privacy policy helps you understand what personal data we may collect, and how such data is used and processed. “Personal Data” refers to data which allows the identification of an individual person (as defined and in compliance with the European Union’s General Data Protection Regulation 2016/679 (“GDPR”). This is opposite to “non-personal data” or “anonymous data” meaning data which does not relate to an identified or identifiable natural person or to Personal Data rendered anonymous in such a manner that the data subject is not or no longer identifiable.

We commit to adhere to the provisions of the aforementioned legislation and other such applicable laws and regulations pertaining to processing of Personal Data. The practices described in this policy are subject to applicable laws in the places in which we operate.

### Personal Data collection and uses

This policy applies to users of Bout's services, including users of Bout's apps, websites, social media services, features and other services. This policy describes also how Bout and its affiliates process Personal Data. This policy specifically applies to the following data subjects:

- Passengers: users who request or receive transportation
- Captains: users who provide boat transportation individually or through partner boat transportation companies
- Potential customers and other our external business partners

This policy also applies to those who provide Personal Data to Bout in connection with an application to use our services, or whose Personal Data Bout otherwise receives in connection with its services.

### Contact information

Controller: Bout Oy AB, registration number 2883889-2,  
Otakaari 5 A, 02150 Espoo, Finland

Contact details: [info@bout.fi](mailto:info@bout.fi)

If, at any time, you have questions or concerns about this privacy policy or you want to use your rights, please do not hesitate to contact us.

### Personal Data we collect

We collect the following Personal Data. The primary source of Personal Data is the relevant data subject. Mainly, Personal Data is collected when the data subject uses our services or communicates with us. In some cases, we may also collect Personal Data from third parties,

such as public registers or analytics tools or from the organisations the data subject represents.

Personal Data may include:

- **User profile (passengers and captains)\***
  - We collect necessary Personal Data when you create or update your Bout account. This may include the following Personal Data:  
**Passengers:** your name, email, phone number, password, and birth date (passengers must be 18 or older), emergency contact numbers and photo as well as preferences and settings that you enable for your Bout account.  
**Captains:** your name, email, phone number, password, birth date, firm name/business number, photo and the preferences and settings that you enable for your Bout account.
- **User content\***
  - We may collect Personal Data that you submit when you contact Bout customer support, provide ratings or compliments for other users, or otherwise contact Bout.
- **Location and trip information\***
  - Depending on your app settings or device permissions, we may collect your precise or approximate location information as determined through data such as GPS, IP address and WiFi.
  - If you are a captain, Bout collects location information when the Bout app is running in the foreground (app open and on-screen) or background (app open but not on screen) of your device.
  - If you are a Passenger and have provided permission for the processing of location data, Bout collects location information when the Bout app is running in the foreground. In certain regions, Bout also collects this information when the Bout app is running in the background of your device if this collection is enabled through your app settings or device permissions.
  - Passengers may use the Bout app without enabling Bout to collect their location information. However, this may affect the functionality available on your Bout app. For example, if you do not enable Bout to collect your location information, you will have to manually enter your pickup address. In addition, location information will be collected from the captain during your trip and linked to your account, even if you have not enabled Bout to collect your location information.
- **Transaction information\***
  - We collect transaction details related to your use of our services, including the type of services you requested or provided, your order details, delivery information, date and time the service was provided, amount charged, distance travelled, and payment method. Additionally, if someone uses your promotion code, we may associate your name with that person.
- **Payment information\***

- We use Stripe for the payments of our services. When you make payments through Stripe, Stripe will receive your transaction and payment verification information, contact information and other necessary Personal Data for the payment processing. Bout does not have access to your payment information. See more on the Stripe's Privacy Policy [here](#).
- **Device information\***
  - We may collect information about the devices you use to access our services, including the hardware models, device IP address, operating systems and versions, software, file names and versions, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion information, and mobile network information.
- **Communications data\***
  - We enable users to communicate with each other and Bout through the Bout apps, websites, and other services. For example, we enable captains and Passengers to call or text each other. To provide this service, Bout may receive some information regarding the communication.
- **Information from other sources including\***
  - User feedback, such as ratings or compliments.
  - Users providing your information in connection with referral programs.
  - Users requesting services for or on your behalf.
  - Users or others providing information in connection with claims or disputes.
  - Bout business partners through which you create or access your Bout account, such as payment providers, social media services, on-demand music services, or apps or websites who use Bout's APIs or whose API Bout uses (such as when you order a ride through Google Maps).
  - Insurance providers (if you are a captain).
  - Financial services providers (if you are a captain).
  - Partner transportation companies (if you are a captain who uses our services through an account associated with such a company).
  - Publicly available sources.
- **Safety and security\***
  - We use your data to help maintain the safety, security and integrity of our services and users. This includes, for example:
  - Screening captains prior to enabling their use of our services and at subsequent intervals, including through reviews of background checks where permitted by law, to prevent use of our services by unsafe captains.
  - Using information from captains' devices to identify unsafe driving behavior such as speeding or harsh braking and acceleration, and to raise awareness among captains regarding such behaviors.
  - Using device, location, profile, usage and other information to prevent, detect, and combat fraud or unsafe activities. This includes processing of such information, in certain countries, to identify practices or patterns that indicate fraud or risk of safety incidents. This may also include information from third parties.

- Using user ratings to encourage improvement by affected users, and as grounds for deactivating users with ratings below a certain minimum as may be required in their region.

\*Mandatory Personal Data. Without that Personal Data Bout cannot for example provide its services and necessary communication and ensure security and safety of the services.

Bout may combine Personal Data collected from these sources with other information in its possession.

### **Purposes and legal basis for processing**

We process Personal Data for the purposes including but not limited to:

- To provide services and to maintain our relationship with the data subjects
- Management of customer service, feedbacks and related communications
- Registrations for our services
- Direct marketing (including electronic direct marketing and other direct marketing activities) and customer analysis and surveys and target marketing
- Business planning and product and application development
- Ensuring security of our products and services and preventing abuses
- Ensuring security of our IT environments and protection of data
- To enhance the safety and security of our users and services
- For customer support
- For research and development by both Bout or our partners such as universities, research institutes and co-developers
- To enable communications to or between users
- To provide promotions or contests
- In connection with legal proceedings
- Create and update your account.
- Verify your identity.
- Enable transportation, deliveries, and other services. This includes automated processing of your information to enable dynamic pricing, in which the price of a ride is determined based on constantly varying factors such as the estimated time and distance of the predicted route, estimated traffic, and the number of Passengers and captains using Bout at a given moment.
- Process or facilitate payments for our services.
- To track the progress of your ride or delivery.
- Enable features that allow you to share information with other people, such as when you submit a compliment about a captain, refer a friend to Bout, split fares, or share your estimated time of arrival ("ETA").
- Perform internal operations necessary to provide our services, including to troubleshoot software bugs and operational problems, to conduct data analysis, testing, and research, and to monitor and analyze usage and activity trends.

We may also need to process Personal Data to ensure that we are compliant with the applicable legal obligations, such as tax law, accounting related obligations. Furthermore, Personal Data may be needed to respond to and defend against legal claims and complaints and other disputes.

We process Personal Data on the following legal basis:

- For the purposes of performance of a contract to which a relevant data subject is party or in order to take steps in order to enter into a contract (both passengers and captains and other users of our services).
- For the purposes related to our legitimate interest to inform you about our services, to deliver and maintain our services, provide relevant marketing information (including direct and target marketing) and communication about our services and to maintain a customer relationship and ensuring security of our services and preventing abuses as well as research and development purposes among others. Where Bout relies on the legitimate interests as a legal basis for the processing of Personal Data, it has considered whether or not those interests are overridden by the rights and freedoms of data subjects and has concluded that they are not.
- To comply with our legal obligations applicable to us (such as accounting and tax law related)
- Based on your consent for example regarding direct marketing activities, if applicable law requires a consent. In addition, Bout relies on consent in connection with data collections or uses that are necessary to enhance the user experience, to enable optional services or features, or to communicate with you. The following types of data collections or uses are done on the basis of your consent.
  - Location Information (Passengers)
  - Share Live Location (Passengers)
  - Notifications: Account and Trip Updates
  - Notifications: Discounts and News

### **Cookies and third party technologies**

Bout use cookies and other identification technologies on our apps, websites, emails, and online ads for purposes described in this policy. Cookies are small text files that are stored on your browser or device by websites, apps, online media, and advertisements.

Bout uses only strictly necessary cookies and similar technologies for purposes such of authenticating users and remembering user preferences and settings. You can allow and control cookies on your browser or device by using the appropriate settings of a browser or device. Please note that disabling use of certain cookies may downgrade or reduce our service's functionality.

### **Access and sharing of Personal Data**

We may share Personal Data with third parties that process Personal Data on our behalf, for example with our external service providers such as our IT service provider. We ensure the proper processing of Personal Data through adequate contractual obligations. List of recipients that process Personal Data can be provided upon request.

Personal Data are also shared or transferred to third parties for the purposes described in this privacy policy if required under applicable laws or regulation or order by competent authorities, or to investigate possible infringing use of our services as well as to guarantee safety of the services.

In case of an emergency or other surprising event, we may need to disclose Personal Data to protect health, safety and property. In addition, we may be obliged to transfer Personal Data to the third parties involved in any business operation, merger, sale of our assets, or other similar arrangements.

Personal Data may also be transferred outside the European Economic Area (“EEA”) by Bout or our service providers. In case Personal Data is transferred outside the EEA, such transfers are either made to a country that is deemed to provide a sufficient level of privacy protection by the decision of the European Commission or transfers are carried out by using appropriate safeguards such as standard data protection clauses. More information can be provided upon request.

Here are examples of how Bout may share Personal Data we collect:

1. With other users

- For example, if you are a Passenger, we may share your first name, average Passenger rating given by captains, and pickup and/or drop-off locations with captains.
- If you are a captain, we may share Personal Data with your Passenger(s) including name and photo; vehicle make, model, colour, license plate, and vehicle photo; location; average rating provided by Passengers; total number of trips; for how long you have been using the Bout app; and contact information (depending upon applicable laws). If you choose to complete a captain profile, we may also share any information associated with that profile, including information that you submit and compliments that past Passengers have submitted about you. The Passenger will also receive a receipt containing information such as a breakdown of amounts charged, your first name, photo, and a map of the route you took.

2. At your request

- Other people at your request. For example, we may share your ETA and location with a friend at your request, or your trip information when you split a fare with a friend.
- Bout business partners. For example, if you requested a service through a partnership or promotional offering made by a third party, Bout may share your information with those third parties. This may include, for example, other apps or websites that integrate with our APIs, vehicle suppliers, or services, or those with an API or service with which we integrate, or business partners with whom Bout may partner with to deliver a promotion, a contest or a specialized service.

3. With the general public when you submit content to a public forum

- We love hearing from our users -- including through public forums such as Bout blogs, social media, and certain features on our network. When you communicate with us through those channels, your communications may be viewable by the public.

4. With the owner of Bout accounts that you may use

- If you use a profile associated with another party we may share your trip information with the owner of that profile. This occurs, for example, if you are:

- A Passenger using your employer's Bout for Business profile.
  - A captain using an account owned by a partner transportation company.
  - A Passenger who takes a trip arranged by a friend or under a Family Profile.
5. With Bout subsidiaries and affiliates
- Subject to the requirements under the GDPR and other applicable laws, we may share and transferred Personal data with our subsidiaries and affiliates for the purposes described in this privacy policy to help us provide our services or conduct data processing on our behalf.
6. With Bout service providers and business partners
- Bout may provide Personal Data to its vendors, consultants, marketing partners, research firms and institutions, and other service providers or business partners. This may include, for example:
    - Payment processors and facilitators.
    - Background check providers (captains).
    - Cloud storage providers.
    - Marketing partners and marketing platform providers.
    - Data analytics providers.
    - Research partners such as universities and research institutes, including those performing surveys or research projects in partnership with Bout or on Bout's behalf.
    - Vendors that assist Bout to enhance the safety and security of its apps.
    - Consultants, lawyers, accountants and other professional service providers.
    - Insurance and financing partners.
    - Boating solution vendors or third party vehicle suppliers.
7. For legal reasons or in the event of a dispute
- Bout may share Personal Data if it is required by applicable law, regulation, operating agreement, legal process or governmental request, or where the disclosure is otherwise appropriate due to safety or similar concerns.
  - This includes sharing Personal Data with law enforcement officials, government authorities or other third parties as necessary to enforce our Terms of Service, user agreements, or other policies, to protect Bout's rights or property or the rights, safety or property of others, or in the event of a claim or dispute relating to your use of our services.
  - This also includes sharing Personal Data with others in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company.
8. With your consent
- Bout may share your Personal Data other than as described in this policy if we notify you and, if required in applicable laws, you consent to the sharing.

## **How we protect Personal Data**

We commit to follow security provisions of the applicable data protection regulations. We use appropriate technical and organizational safeguards to protect Personal Data, including the use of firewalls, encryption techniques and safe device facilities, proper access control and guidance for personnel as well as subcontractors involved in the processing of Personal Data.

Our personnel, external workforce and processors that process Personal Data are obliged to keep Personal Data confidential. Access to Personal Data is only granted to those employees that need the information to perform their work-related duties.

### **Retention of Personal Data**

Bout retains user profile and other Personal Data for as long as you maintain your Bout account. If you have not logged in your user account or otherwise used our services within the period of two years, your user account and your Personal Data related to your user account will be deleted within a reasonable timeframe. This applies both the passengers and captains. However we may retain some Personal Data for the development and research purposes as described in this privacy policy.

Bout retains transaction, location, usage and other information for 10 years in connection with regulatory, tax and accounting insurance or other requirements in the places in which it operates. Bout deletes or anonymizes such Personal Data in accordance with applicable laws, unless Personal Data is needed to handle and resolve claims, complaints or litigation or similar dispute cases.

If you withdraw consent to the processing of Personal Data for optional features, such as features that use your calendar or address book, Bout deletes such Personal Data.

Users may request deletion of their accounts at any time or users can log in to the account and delete the account under Profile section and using "Delete account" option. Personal Data will be deleted unless Personal Data is necessary to retain for the purposes described in this privacy policy such as to be kept under applicable law.

### **Your rights**

As a data subject, you have several rights under the GDPR and other applicable data protection laws.

#### **1. Right of access**

- You have the right to request a confirmation as to whether your Personal Data are being processed and the certain information concerning the processing of your Personal Data.
- You also have the right to receive a copy of your Personal Data.

#### **2. Right to rectification**

- You are entitled to have your Personal Data rectified or, in certain cases, to have incomplete Personal Data supplemented.

#### **3. Right to erasure (right to be forgotten)**

- You are entitled to require Bout to erase Personal Data related to you for example, if you consider them unnecessary for the purposes described above or you cancel

the consent you have given. We may retain certain information about you as required by law and for other legitimate purposes described in this privacy policy.

#### **4. Right to data portability**

- You have the right to receive your Personal Data you have submitted to us for processing based on your consent or performance of contract. You are entitled to receive Personal Data in a structured, commonly used and machine-readable format, and the right to transfer that Personal Data to another controller.

#### **5. Right to object to the processing**

- You are entitled to object to the processing of your Personal Data based on Bout's legitimate interests, including profiling. Bout may reject the request, if the processing is necessary in order to implement Bout's mandatory and legitimate interests. In addition, you have always right to oppose to the processing of your Personal Data for any direct marketing purposes and for profiling related to direct marketing.
- You have right to object the processing based on automatic decision making which produces legal effects concerning you or similarly significantly affects you as specified in the GDPR.

#### **6. Right to restriction of processing**

- You have the right under certain circumstances specified in the GDPR to require the Bout to restrict the processing of your Personal Data.

#### **7. Right to withdraw your consent**

- If the processing of your Personal Data is based on your consent, you have the right to withdraw your consent. The withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

### **How to use your rights**

You may exercise the aforementioned rights by sending a written request (by email or post) to us using the aforementioned contact details. After receiving all the required information of your request (incl. confirmation of identity), we will start the processing of your request. We will contact you at latest within a period of one month. If your request is denied, you shall be informed about the refusal in writing.

Please note that your rights and options depend on the purposes of the processing of Personal Data and on the particular situation. Note also that if the purposes for which your Personal Data is processed do not or do no longer require your identification and we are not able to identify you, certain rights under the GDPR do not apply. In that case we will inform you.

If you believe that we have not complied with applicable data protection laws when processing your Personal Data, you can lodge a complaint with a competent supervisory authority.

Contact details of the Finnish data protection authority can be found [here](#).

Contact details of the Swedish data protection authority can be found [here](#).

### **Marketing Opt-out**

You may opt out of receiving promotional emails from Bout by sending Bout an email. You may also opt out of receiving emails and other messages from Bout by following the instructions in those messages how to unsubscribe direct marketing messages.

Please note that if you opt out, we may still send you non-promotional messages, such as receipts for your rides or information about your account and/or information regarding changes of our terms of services and/or information which we are required to inform under applicable laws.

#### **Updates to this privacy policy**

We may make changes to this privacy policy at any time, so please review it frequently. Changes may also be carried out due to changes in legislation. Then-current privacy policy is available on our websites, apps and other services. Unless stated otherwise, the then-current privacy policy applies to all Personal Data we process at the time. In case Bouts makes significant changes to this privacy policy, we will inform you by notifications in our services or by email.

This privacy policy has been published on 1.7.2020.