

Privacy Policy

Neutron Holdings, Inc. dba MY APP LTD and its affiliates (collectively " MY APP LTD ," " we ," " us ," or " our") are strongly committed to transparency, and we want you (" you" or " your") to understand how we collect, use, share and protect your information. This Privacy Notice (" Privacy Notice") describes how MY APP LTD handles information in connection with MY APP LTD's websites, MY APP LTD-owned vehicles, and related mobile applications and services (collectively, the " Services"), and when you otherwise interact with us.

We may change this Privacy Notice from time to time. We will inform you about any material changes.

The Types of Information We Collect

The types of information we collect or receive depends on how you use and interact with our Services. In many cases, you can choose the information you provide to us, although if you choose not to provide certain information (such as account information), we will not be able to provide the Services. We use, disclose and retain this information for the purposes described further below. The types of information we collect include:

Account Information such as your name, ID number, e-mail address, telephone number, date of birth, gender, address details, and payment information such as your credit card details.

Identification documentation: in order to use certain Services, we may also require you to provide photos of your government issued identification (such as your national identity card or passport). As part of MY APP LTD Access, we also collect proof of low-income status for verification purposes. If you refuse to provide such identification we may not be able to provide you with such Services.

We collect and process location data when you sign up and use the Services. For example, to accurately show you MY APP LTD Excepts that are available near you, it is necessary to collect and record the location of your mobile device.

If you link, connect, or login to MY APP LTD with a third-party service (e.g. Facebook), the third-party service may send us information such as your profile information from that service.

When you ask for customer service, support or other assistance, you can choose to provide us with your contact information so we can better respond to your requests and we may keep information about your engagement with our support services.

MY APP LTD and third parties (such as Facebook) collect information from your browser, computer, or mobile device, which provide us with technical information such as your device's IP address and device token when you access or use the Services. We use cookies and similar tracking technologies (like pixels and tags) to provide our Services, including to protect the security of the Service, remember your settings and to gather analytics information about you. Third parties may use the technical information to provide measurement services and targeted ads. You can learn more about how we (and third parties) use cookies and similar technologies and how you can opt-out of the information being used for advertising purposes in our Cookies Policy.

We collect information you share on the Services such as when you participate in communities or other forums, or comment on our social media accounts or blog entries.

We receive information about you when we use third-party partners such as marketing and advertising partners, such as social media networks.

How We Use Information

We use your information, including information about your location, to:

- provide the Services to you at your request including to manage your account and service order's history.
- confirm your government-issued ID (if provided) is not currently linked to any other MY APP LTD account, and has not expired;
- process payments or subscriptions and any discounts or special offers
- communicate with you about your account, interactions or transactions including service-related announcements such as changes to our policies. As allowed by local law, we may also send you surveys or marketing communications on behalf of MY APP LTD and/or third parties, including information about features and enhancements to our Services;
- personalize advertisements to you (for more information, see the "Advertising and Analytics" section below);
- optimize, develop and improve our Services, including via the creation and training of machine learning models. To do this we may use third party analytics providers to understand how the Service is being used and to help us to improve the Services;

- where necessary, comply with our legal obligations including to meet regulatory or local law requirements;
- detect, investigate, and prevent activities that may violate MY APP LTD's policies or terms or be illegal, including accidents, which may include sharing information with government agencies, such as law enforcement agencies and municipal authorities, which may be located outside of your home country; and
- share and collaborate with third parties such as universities, local government authorities and other third parties to build or improve transportation infrastructure, as described in the "Who Do We Share Your Information With?" section below.

Who Do We Share Your Information With?

We share your information with:

Our service providers and partners : We share your information with our trusted service providers, partners, and their personnel who provide services to MY APP LTD such as hosting data and our infrastructure, providing ID verification services, processing payments and donations, supporting and improving the Services, performing customer service, or providing marketing and advertising services. For example, we share information with credit card issuers in order to process your payments and refunds.

Collaborations with third parties : After removing certain identifiers, such as your name, phone, and e-mail address (where provided), and combining the resulting information with similar information from other users, MY APP LTD may share your information, including individual trip records and trip location (journey) history, with third parties for research, business or other purposes.

Government, municipal, regulatory and law enforcement agencies : We may share your information with government, municipal, regulatory, and law enforcement agencies to meet federal, state, regulatory or local law requirements, as part of a judicial process, to detect, investigate, prevent, and address fraud and other illegal activity, to address security or technical issues, or to prevent harm or injury to you, members of the public, our staff, other third parties, or ourselves; or if we need to do so to defend our legal rights or property, to take action regarding illegal activities or traffic offenses, or to enforce our contracts, such as our User Agreement.

Integrated Partners : We share your information with third party services which integrate or provide access to MY APP LTD the Services on their platforms or that make their products available on our Services.

MY APP LTD affiliates : We may share your information with MY APP LTD affiliate companies to help provide, maintain and improve the Services.

Business re-organization : We may also share your information as part of a sale, merger, change in control or business restructuring.

Advertising and Analytics

We allow others to provide analytics services and serve advertisements on our Services and on our behalf across the web and in mobile apps. These entities may use cookies, web beacons, device identifiers, and other technologies to collect information about your use of our Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in mobile apps, links clicked, and conversion information. This information may be used by MY APP LTD and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services and other websites, measure the effectiveness of our advertising, and better understand your online activity. You can find more information about why we use cookies and similar technologies in our Cookies Policy.

Where MY APP LTD uses the Meta pixel (a type of cookie) to provide advertising to you, MY APP LTD and Meta Ireland are joint controllers for this processing. MY APP LTD and Meta Ireland have entered into a Controller Addendum to divide their respective responsibilities under the General Data Protection Regulation in respect of this joint processing, for example, MY APP LTD is responsible for providing this notice to you and Meta Ireland is responsible for managing your individual rights relating to the joint processing. For information on how to exercise your rights with Meta Ireland in relation to the joint processing, and for information on how Meta Ireland subsequently processes your personal information as independent data controller, please see the Meta Ireland's Privacy Policy.

We also work with third parties to serve ads to you as part of customized campaigns on third-party platforms (such as Facebook and Instagram). As part of these ad campaigns, we or the third-party platforms may convert information about you, such as your email address and phone number, into a unique value that can be matched with a user account on these platforms to allow us to learn about your interests and serve you advertising that is customized to your interests. Note that the third-party platforms may offer you choices about whether you see these types of customized ads.

We do not sell your personal information with third parties for their direct marketing purposes.

Our Legal Basis for Using Your Information

If you are located in the European Economic Area ("EEA"), United Kingdom, or Switzerland, MY APP LTD relies on a number of legal bases to collect, use, share, and otherwise process your information for the purposes described in this Privacy Notice, including where:

- it is necessary to provide the Services and perform our obligations in accordance with our terms. For example, we cannot provide the Services unless we collect and process information about you and your location;
- you have consented to us processing your information (in which case you may revoke your consent at any time);
- necessary to comply with a legal obligation, including, for example, responding to government agency or law enforcement information requests or to establish, exercise or defend legal claims;

How We Transfer Your Information

As we offer our Services in many locations globally, we may transfer your information to or from these locations for the purposes of providing you Services.

For Residents of the European Economic Area, Switzerland, or the United Kingdom: please be aware that certain countries outside the EEA, Switzerland, or the United Kingdom may not offer the same level of data protection as in your home country. Where the European Commission has recognized a country as providing an adequate level of data protection, MY APP LTD may rely on the Commission's adequacy decision, as applicable, to transfer data.

MY APP LTD also relies on Standard Contractual Clauses approved by the European Commission or other appropriate transfer mechanism(s) to transfer data from the EEA,

Switzerland and the United Kingdom to the United States and other countries outside of where you live.

In certain limited circumstances, we may use derogations where appropriate to process personal information, when there are no other data transfer mechanisms applicable.

How Long We Keep Information

We keep your information for as long as is reasonably necessary to provide the Services to you or until your account is deleted, whichever is longer, subject to any longer period as may be required by applicable law or notified to you. For example:

We retain account information, such as your email address and your date of birth, for the lifetime of the account. Certain information relating to transactions relating to an account are retained for 7 years in line with MY APP LTD's accounting obligations;

We retain information related to customer support queries for the lifetime of the account.

When you delete your account, it may take us additional time to fully delete your information from our databases and system logs. We may also retain information from deleted accounts to prevent fraud, collect fees, enforce the User Agreement, to comply with our legal obligations or enforce our legal rights.

In addition, if you are a logistics provider or personnel of a logistics provider, MY APP LTD retains certain information to the extent necessary to comply with our legal obligations. For example, MY APP LTD may keep some of your information in order to comply with applicable tax, legal, reporting and auditing obligations and other requirements in the countries in which we operate.

Your Rights

Depending on where you live, you may benefit from a number of rights in relation to your information, including:

- Right to object (marketing) - You have the right to object to processing for direct marketing purposes at any time.
- Right to object (legitimate interest) - Where we process your information based on legitimate interests, you can object to this processing in certain circumstances. Unless

we have compelling legitimate grounds or where it is needed for legal reasons, we will cease processing your information when you object.

- Right of access - You can access much of your information by logging into your account. You can also request a copy of the information we have about you and information explaining how the information is used.

- Right of rectification - You have the right to request that we rectify inaccurate information about you. You may be able to edit this information in the Settings of the MY APP LTD app.

- Right of erasure - You have the right to request that we delete your information.

- Right to restrict processing - You have the right, in certain cases, to temporarily restrict the processing of your information by us, provided there are valid grounds for doing so.

- Right to data portability - You may have the right to receive certain of your information in a structured, commonly used and machine-readable format and to transmit such information to another controller.

- Right to withdraw consent - Where you have previously provided your consent, such as to send you direct marketing, you have the right to withdraw consent at any time. However, this will not affect the lawfulness of the processing based on consent before its withdrawal. Furthermore, even in case of a withdrawal, we may continue to use your information as permitted or required by law.

Your Choices and How You Can Manage Your Information : We believe you should have choices about the collection, use and sharing of your information. If you do not want MY APP LTD to collect your information, please do not use the Services.

Emails and Other Communications : If you would like to change the types of communications you receive from us, including opting out of promotional communications from us, you may do so at any time by updating the communication preferences specified in your account profile. If you opt out of receiving promotional communications from us, we may continue to send non-promotional communications and other information about your use of the Service.

Accessing and Managing Your Information : If you have an account with MY APP LTD, you can review, change or delete your information by logging into your account and editing

your profile. You can change your mobile phone number or email address by using our in-app change feature. You can delete your MY APP LTD account at any time by selecting “Delete your account” from the Settings screen in the app, by submitting a request to us at support@myappltd.com or by using the in-app "Submit a Request" feature. If you are a logistic provider or personnel of a logistics Provider and wish to delete your account, please email support@myappltd.com.