

Privacy Policy "AdriGo Tenerife S.L." & Accessibility Statement

1. Privacy Policy "AdriGo Tenerife S.L." for users and candidates.

This Data Protection Statement describes our data protection practices of AdriGo its subsidiaries and affiliated entities in European Union (EU) (hereinafter referred to as "AdriGo", "we," "us," or "our") when HR data is processed. The protection of your personal data is important to us. We comply with legal regulations on data protection and data security.

Your use of AdriGo electric scooters services is governed by applicable terms and our general Privacy Policy. Below you will find information about which personal data we collect and how we use it for which purposes. In addition, we will inform you about the legal bases for the processing of your data as well as about your specific rights with regard to data protection.

"Personal data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processed Data

For each and every process and purpose we process different types of data. This policy covers the information you share with us and/or which may be acquired or produced by AdriGo during (A) the use of our micromobility service (website/mobile app/customer support) and (B) the application or recruitment process.

A) Service Users (Micromobility App Users) – typical categories of personal data:

- Phone number (SMS verification) and email address (if provided).
- Account and profile data (e.g., preferred language, basic settings).
- Trip and rental data (e.g., start/end time, duration, tariffs, scooter ID).
- Location data necessary to provide the service (e.g., pick-up/parking zones).
- Payment and transaction data (e.g., payment status, transaction identifiers; full card details are handled by the payment provider).
 - AdriGo does not receive or store your actual credit or debit card numbers used with Apple Pay and other payment systems. Instead, Apple/other payment systems provide us with a unique Device Account Number (token) and a transaction-specific dynamic security code to complete your purchase securely.
- Device and technical data (e.g., device model/OS, app version, IP address, identifiers, security and access logs).
- Customer support communications (e.g., chat/email/Telegram messages related to your account).
- Fraud and safety data (e.g., abuse prevention signals, incident reports), where applicable.

B) Candidates / Applicants – categories of personal data processed during the application or recruitment process:

- First and last name
- Email Address, address, telephone numbers (and other contact information)
- Application documents, including resume or CV, employment history, cover letter, education, transcripts and other statements of experience and education.
- Type of employment sought, desired salary, willingness to relocate, or other job preferences.
- Details of how you heard about the position you are applying for.
- Sensitive information (race/ ethnic origin), if you voluntarily submit such information as part of the application process
- Information relating to any previous applications you may have made to AdriGo and/ or any previous employment history with AdriGo.
- Reference information and/or information received (including names and contact information for referrals) from professional and educational checks, including information provided by third parties.
- Information about your educational and professional background from publicly available sources, including online, that we believe is relevant to your application or a potential future application (e.g. your LinkedIn profile).
- Information related to any assessment you may take as part of the interview screening process.
- Information from interviews and phone-screenings you may have if any.

Purposes of Data Processing

AdriGo processes personal data for the following purposes (as applicable to you):

A) Service Users (Micromobility service):

- Provide and manage the rental service (account setup, unlocking/ending rides, parking rules, tariffs).
- Billing, payments, debt collection for outstanding amounts, and dispute handling.

- Information collected during an Apple Pay transaction is used strictly for order fulfillment, fraud prevention, and legal compliance. We do not share this payment-related data with third parties for marketing purposes without your express consent.

- Customer support and incident management.
- Safety, fraud prevention, and security of our systems and users.
- Compliance with legal obligations and responding to lawful requests.

B) Candidates / Applicants (recruitment):

- Recruit, source, select, hire employees including the conduct of professional and educational checks and verifying your information.
- Communication with you on the recruitment process and/ or your application, including informing you of other potential career opportunities at AdriGo.
- Creating and submitting reports as required by law or other regulations, where applicable.
- Complying with applicable laws, regulations, legal processes or enforceable governmental requests.
- Improving our recruitment process, including by generating analytics using Candidate information.
- If you are offered and accept employment with AdriGo, the candidate information will become part of your employment record and will be used for employment purposes.

Legal basis

Pursuant to the GDPR, we process your personal data for the following legal bases.

A) Service Users (Micromobility service): We process personal data primarily on the following legal bases (Art. 6 GDPR):

Performance of a contract (Art. 6(1)(b)) – to provide the rental service and manage your account and rides.

Legal obligation (Art. 6(1)(c)) – e.g., accounting/tax and compliance requirements.

Legitimate interests (Art. 6(1)(f)) – e.g., fraud prevention, security, service improvement, and defending legal claims.

Consent (Art. 6(1)(a)) – where required, e.g., optional marketing communications or non-essential cookies/trackers.

B) Candidates / Applicants (recruitment):

We process candidate information where it is necessary to take steps, at your request, prior to entering into an employment contract (Art. 6(1)(b) GDPR).

We may also process candidate information on the basis of consent (where applicable), to comply with a legal obligation, and/or for our legitimate interests (e.g., to manage and improve recruitment), and for purposes connected to legal claims (Art. 6(1)(a), (c), (f) GDPR).

Disclosure and transfer of personal data

We may share personal data with other AdriGo entities and with service providers acting on our behalf, to the extent necessary and on an applicable legal basis. For service users, this may include payment and billing providers, hosting/infrastructure providers, mapping/geo services, customer support tools, IT support, and fraud/security vendors.

Disclosure of Data Shared by Apple Pay

- When you make a purchase using Apple Pay, we receive certain personal information provided by you through the Apple Pay interface, such as your name, email address, and shipping address. This information is used solely to process your transaction and deliver your order.

For candidates, this may include external HR entities, payroll/benefit providers, accounting providers, auditors, management consultants, health insurers, recruiters, background check providers, and outside counsel. Service providers and affiliates receive only the data necessary to perform their tasks and are bound by confidentiality and data protection obligations.

Where personal data is transferred outside the European Economic Area (EEA), we ensure an adequate level of protection by relying on (i) adequacy decisions of the European Commission (where applicable, including the EU-U.S. Data Privacy Framework for certified U.S. recipients), or (ii) appropriate safeguards such as the European Commission's Standard Contractual Clauses (SCCs), and where required, supplementary measures. You may request information about the safeguards applied to international transfers (including a copy of the relevant SCCs, where applicable) by contacting us using the contact details provided in this Policy.

Time period for storage of data

We retain personal data only for as long as necessary for the purposes described in this Policy and in accordance with applicable legal retention obligations. Retention periods may vary depending on the data category, legal requirements, and whether the data is needed to establish, exercise, or defend legal claims.

Retention schedule (summary):

Data category	Examples	Typical retention period	Notes / legal basis
Account & contact data	Phone number, email, profile settings	While account is active + up to 24 months after closure	For service provision, support, and legal claims.
Trip / rental data	Ride history, scooter ID, start/end time, parking information	Up to 24 months (or longer if required for disputes/claims); aggregated analytics may be kept longer	Needed for billing, customer support, and service improvement.
Payment / transaction data	Transaction IDs, amounts, status, invoices/receipts	Typically 6 years (business/accounting records) or longer if required by tax law	Full card details are handled by the payment provider; we keep only what is necessary.
Support communications	Emails, chat/Telegram messages linked to your account	Up to 24 months after ticket closure	To resolve issues and for quality and legal purposes.
Security & access logs	Login/authorization logs, IP address, device/app identifiers	Typically 6–12 months	Security, fraud prevention, incident response.
Fraud / safety incident records	Abuse reports, accident/incident notes	Duration of investigation + up to 5 years (claims)	Legitimate interests and legal claims.
Recruitment data (candidates)	CV, interview notes, assessment results	Typically 12–24 months after closure of the process (unless extended by consent)	To manage recruitment and defend against legal claims.

Data protection rights

- **Right to rectification**
You have the right to demand that AdriGo immediately corrects personal data relating to you if those data are incorrect. Depending on the purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- **Right to erasure (“right to be forgotten”)**
You have the right to demand that AdriGo deletes the personal data relating to you under the prerequisites described in Art. 17 GDPR.
These prerequisites establish especially a right to erasure if the personal data are no longer necessary for the purposes for which they were collected or otherwise processed as well as in situations involving illegal processing, the existence of a right to object or withdraw a consent, the existence of a duty to delete under the law of the European Union or the law of the Member States governing AdriGo or when the data were collected with regard to services offered in the information society pursuant to Art. 8 para. 1 GDPR.
- **Right to restrict processing**
You have the right to demand that AdriGo restricts the processing in accordance with Art. 18 GDPR. This right exists especially if the accuracy of the personal data is disputed between the user and AdriGo for the period required for examining the accuracy as well as in the event that the user demands a restriction on processing instead of deletion in the event that there is a right to deletion, and also in the event that the data are no longer needed for the purposes pursued by AdriGo when the user, however, needs the data to assert, exercise or defend against legal claims, as well as in the situation when the successful exercise of an objection is still disputed between AdriGo and the user.

- **Right to access**

You have the right to receive from AdriGo at any time upon request information about the personal data relating to you which are processed by AdriGo to the extent set forth in Art. 15 GDPR.

This means that you may have the right to obtain from us confirmation as to whether or not personal data concerning you is processed, and, where that is the case, to request access to the personal data. The access information includes – inter alia – the purposes of the processing, the categories of personal data concerned, and the recipients or categories of recipient to whom the personal data have been or will be disclosed.

However, this is not an absolute right and the interests of other individuals may restrict your right of access. You may have the right to obtain a copy of the personal data undergoing processing. For further copies requested by you, we may charge a reasonable fee based on administrative costs.

How to exercise your data protection rights (including DSAR under Art. 15 GDPR):

1) Recommended (fastest): submit your request from within the AdriGo mobile app, from the relevant logged-in account (Support / Help section).

2) Alternatively, you may contact us by email at info@adrigo.eu or via our official Telegram support channel. If you use these channels, we may need to verify that you are the account holder before disclosing any personal data.

3) Verification: if we have reasonable doubts about the identity of the requester, we may ask for additional information necessary to confirm identity (e.g., SMS code to the phone number registered in the account and/or specific transaction details). We only request what is necessary and proportionate.

4) Response time: we respond without undue delay and in principle within one month after we can verify the requester's identity and locate the relevant records. In complex cases, the deadline may be extended as permitted by GDPR.

5) Delivery: we will provide the requested information through a secure channel (preferably in-app) and will not disclose personal data to third parties.

- **Right to complain**

You also have the right to file a complaint with the relevant supervisory authority.

- **Right to object**

You have the right to submit an objection against the processing of personal data relating to you at any time for reasons resulting from your specific situation. AdriGo will stop processing your personal data unless AdriGo can prove important reasons for the processing which deserve protection which outweigh your interests, rights and freedoms or if the processing serves to assert, exercise or defend against legal claims.

Changes to this Data Protection Statement

The processing activities of AdriGo can be changed from time to time. and AdriGo accordingly reserves the right to amend this Data Protection Statement at any time. We will post any changes to the Policy on this page.

2. Accessibility Statement

- ***Commitment to Accessibility***

AdriGo is committed to ensuring digital accessibility for its products and services in compliance with Regulation (EU) 2019/882, Spanish Royal Decree 1112/2018, and other relevant national legislation.

We continuously work to ensure that our digital platforms - including the website, mobile app, customer support interfaces, and rental process - are accessible to users with disabilities.

- ***Scope***

This statement applies to:

- our official website
- the mobile application for electric scooter rental
- the digital map with parking zones and usage rules
- digital customer support channels (chat, email, Telegram)

- ***Conformance Level and Current Status***

We are working toward WCAG 2.1 Level AA compliance and conformance with Spanish UNE-EN 301 549.

Currently:

Implemented:

- Proper text contrast and scaling on the website
- Keyboard navigation and partial screen reader compatibility
- Alt text for images and buttons

In development:

- Full mobile app screen reader support
- Improved accessibility for users with limited mobility
- Subtitled and sign-language video instructions

Not applicable due to the nature of the service:

Due to the physical risks associated with electric scooter use, this service may not be suitable for persons with certain physical, visual, or neuromotor disabilities.

For safety reasons, we strongly discourage use by individuals who are unable to safely control a personal mobility device.

- **Technical Limitations and User Responsibility**

While we aim to ensure digital access for all, the physical operation of the service has structural limitations:

- We cannot verify the physical condition of users.
- Each user is responsible for ensuring they meet the minimum safety requirements for using our service, as outlined in the User Agreement and Terms of Use.

- **Feedback and Complaints**

If you encounter accessibility barriers or wish to file a complaint regarding digital access, please contact us:

Email: info@adriego.eu

Telegram Support: Tenerife AdriGo (@adriego_tfs)

Complaints may also be submitted to the Accessibility Office of the Ministry of Social Rights and 2030 Agenda, in accordance with Royal Decree 1112/2018.

We will respond within 20 working days, in line with Spanish regulation.

- **Ongoing Updates**

This statement will be reviewed regularly. Audit results and user feedback will inform our future updates.

The AdriGo Team

Micromobility Service **AdriGo**