

## Privacy Policy

We, Bhago Mobility Solutions Private Limited, together with our affiliated entities (“**Bhago**”, “**Company**”, “**we**”, “**our**”, or “**us**”) are engaged in the business of operating and managing electric two wheelers for the purpose of leasing such vehicles to registered drivers and other eligible Users on a flexible, short term or daily basis for mobility and transportation services.

This Privacy Policy governs the manner in which Bhago collects, uses, processes, stores, discloses, transfers, safeguards and retains Personal Data in connection with the use of our website located at [•], our mobile applications, and any other technology platforms operated by us (collectively, the “**Platform**”), as well as any services, features, tools, or functionality made available through such Platform, including the leasing or rental of electric two-wheelers by Bhago to registered drivers, delivery partners, and other individuals authorised by Bhago to access or use the Platform (collectively, the “**Services**”). Such registered drivers, delivery partners, other authorised individuals, and any other individuals accessing or interacting with the Platform or the Services are collectively referred to in this Privacy Policy as “**Users**”, “**you**”, or “**your**.”

By accessing or using the Platform, leasing any products, or otherwise availing the Services, you agree to be bound by this Privacy Policy and any other policies referenced herein. If you do not agree with the terms of this Privacy Policy, you must refrain from accessing or using the Platform or Services.

This Privacy Policy applies when you access or interact with the Platform, or otherwise share Personal Data with us in connection with the provision or use of our Services.

This Privacy Policy explains, among other things: (i) the categories of Personal Data that we collect and process; (ii) the purposes for which such Personal Data is collected, used, processed, stored, disclosed, transferred, shared, safeguarded, and retained; (iii) the rights available to individuals in relation to their Personal Data and the manner in which such rights may be exercised; and (iv) the manner in which Users of the Services may submit queries, complaints, or grievances in relation to the processing of their Personal Data.

For the purposes of this Privacy Policy, “**Personal Data**” shall mean any information that relates to an identified or identifiable natural person, including any information that can be used to directly or indirectly identify such individual, as defined under the Digital Personal Data Protection Act, 2023 (“**DPDP Act**”) and the rules framed thereunder.

By completing the sign-up, onboarding, or otherwise accessing or using the Platform or Services, you acknowledge that you have read, understood, and agreed to be bound by this Privacy Policy, as may be amended from time to time.

We process your Personal Data in accordance with applicable law, and on the basis of your consent or other lawful grounds permitted under applicable law.

Your continued use of the Platform or Services, following updates to this Policy, constitutes acceptance of the revised Policy.

### **1. Categories of Personal Data Collected by Us**

1.1. Bhago may collect and process the following categories of Personal Data in connection with the provision of the Services:

- (a) identification information required to verify the identity of Users and comply with applicable legal or regulatory requirements, including full name, date of birth, gender, photograph, government-issued identification details (such as Aadhaar number, PAN, or other identification numbers), and driving licence details.
- (b) contact information used to communicate with Users, including mobile phone number, email address, residential address, and other contact details.

- (c) information provided during account creation or onboarding on the Platform, including username, login credentials, User identification numbers, and profile details.
  - (d) information relating to the leasing and use of electric two-wheelers, including booking details, vehicle allocation records, ride history, usage duration, and other service-related data generated through use of the Platform.
  - (e) geolocation data, GPS information, IP address, device identifiers, device type, operating system, application usage information, and other technical data collected when Users access or interact with the Platform.
  - (f) information relating to payments and transactions, including bank account details, payment method details, billing information, transaction records, and other financial information necessary to process payments for vehicle leasing or related services.
  - (g) information collected to comply with legal, safety, or regulatory requirements, including driving history, licence verification records, insurance-related information, and other documentation required for eligibility to use the Services.
  - (h) records of communications with us, including customer support requests, feedback, complaints, grievance submissions, and any other correspondence with the Company.
  - (i) information automatically collected when Users interact with the Platform, including log files, access times, browser type, and other analytics information used for system administration, security monitoring, and service improvement.
- 1.2. When you access, use, or interact with the Platform or Services, we may automatically collect certain technical and usage-related information for purposes including security, performance, monitoring, analytics, auditability, and operation of the Platform, which may include:
- (a) log data, including your IP address, browser type and settings, date and time of access, session identifiers, and referring URLs;
  - (b) usage data, including interactions with features, modules, dashboards, APIs, and workflows within the Platform;
  - (c) device information, such as device type, operating system, device identifiers, configuration settings, and language preferences;
  - (d) integration-level data, including request metadata, API activity records, timestamps, and error logs, government portal, or third-party system connections;
  - (e) system performance, diagnostic, telemetry, and security-related data generated through the use of the Platform for reliability, compliance, security monitoring, uptime, and optimisation; and
  - (f) cookies and similar technologies used to operate, secure, administer, analyse, and improve the Platform and Services.
- 1.3. Bhago maintains system-level logs that record acceptance of this Privacy Policy at the time of sign-up or onboarding, including the date, time, and applicable version of the Policy.

**2. Purpose of Collection**

- 2.1. We process Personal Data only for lawful purposes connected with the provision, operation, and improvement of the Services. The categories of Personal Data collected and the purposes for which such Personal Data may be processed are set out below:

Category of Personal Data	Purpose of Processing
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Identification and KYC Information (such as name, date of birth, photograph, Aadhaar, PAN, driving licence details)	To verify the identity of Users, conduct onboarding and registration, determine eligibility to lease vehicles, comply with legal or regulatory requirements, and prevent fraud or misuse of the Services.
Driving Licence Number and Licence Details	Verification of eligibility and legal authorization to operate the leased vehicle and compliance with motor vehicle laws.
Contact Information (such as mobile number, email address, and residential address)	To communicate with Users regarding account registration, leasing arrangements, service updates, operational notifications, and customer support.
Account and Registration Information	To create and manage User accounts on the Platform, authenticate access, maintain User profiles, and enable Users to access and use the Services.
Vehicle Leasing, Operational and Vehicle Usage Information (trip counts, distance travelled, timestamps, vehicle performance indicators, battery status, charging/swapping records, safety alerts, acceptance/cancellation behaviour)	To facilitate the leasing of electric two-wheelers, allocate vehicles, manage bookings, maintain usage records, monitor service utilisation, administer the provision of the Services, ensuring compliance with operational and safety guidelines, assessing performance, investigating incidents, determining misuse or default, and enforcing contractual obligations.
Trip Activity location and Device Information (including GPS data, IP address, device identifiers)	To enable location-based functionalities, support operational management of vehicles, enhance platform security, detect fraudulent activity, and improve the performance and reliability of the Platform.
Financial and Payment Information	To process payments for leasing services, maintain billing records, process refunds where applicable, manage financial transactions, and comply with financial reporting obligations.
Verification and Compliance Information	To verify driving credentials, ensure compliance with applicable laws and safety requirements, maintain operational standards,

	and enforce the Company's policies and contractual terms.
Security Cheque Details (if applicable)	Securing payment obligations and enabling recovery of outstanding dues in case of non-payment under the lease arrangement.
Incident / Accident Reports, FIR or Legal Notices	Compliance with legal and insurance requirements, processing claims, and handling disputes or regulatory matters.
Communications and Support Information	To respond to queries, provide customer support, resolve complaints and grievances, and improve User experience and service quality.
Technical and Log Information (including log data, usage data, and system diagnostics)	To maintain system security, monitor platform performance, analyse usage patterns, conduct internal analytics, troubleshoot technical issues, and improve the functionality and reliability of the Platform.
Cookies and Similar Technologies	To operate and administer the Platform, enable essential functionality, analyse User interactions, enhance security, and improve the overall User experience.

2.2. We limit the processing of Personal Data to purposes that are necessary and proportionate to the provision of the Services, and implements appropriate technical and organizational measures to protect such Personal Data.

### 3. Disclosure of your Personal Data

3.1. Bhago does not sell or otherwise disclose Personal Data except as described in this Privacy Policy and only where such disclosure is lawful, necessary, and proportionate for the provision, operation, and improvement of the Services or to comply with applicable legal obligations.

3.2. We may disclose Personal Data collected or processed in connection with the Platform and the Services to the following categories of recipients, solely to the extent necessary to provide, operate, support, secure, and improve the Platform and Services or as otherwise permitted or required by applicable law:

- (a) to our affiliates and group companies for purposes including service delivery, infrastructure management, technical support, analytics, security monitoring, operational continuity, research and development, compliance, and internal administration;
- (b) to third-party service providers, vendors, contractors, and partners engaged to support the operation of the Platform and Services, including cloud hosting providers, infrastructure providers, analytics providers, security and monitoring vendors, payment processors, identity verification providers, customer support providers, and professional service

- providers. Such disclosures are subject to contractual obligations requiring appropriate confidentiality, data protection, and security safeguards;
- (c) to third-party partners involved in enabling the Services, including vehicle fleet operators, vehicle financing partners, charging infrastructure providers, logistics partners, or other operational partners, to the extent necessary to facilitate vehicle leasing, usage, maintenance, or support;
  - (d) to payment gateways, banks, financial institutions, and payment processing service providers for the purpose of facilitating transactions, processing payments, refunds, deposits, and related financial services;
  - (e) to service providers that assist in maintaining the security, integrity, and functionality of our Platform, including providers engaged in system hosting, data storage, fraud detection, identity verification, analytics, and user support services;
  - (f) to our legal, tax, audit, insurance, or other professional advisors where necessary to obtain professional advice, ensure regulatory compliance, or protect Bhago's legal rights, subject to appropriate confidentiality obligations.
  - (g) to law enforcement authorities, regulatory bodies, courts, or other governmental authorities where required to comply with applicable law, legal processes, or lawful requests, or where disclosure is necessary to detect, investigate, prevent, or address fraud, security incidents, misuse of the Platform, or other unlawful activities.
  - (h) in connection with a merger, acquisition, restructuring, financing, sale of assets, or other corporate transaction, Personal Data may be disclosed to prospective or actual counterparties and their advisors, subject to appropriate confidentiality and data protection safeguards.

#### **4. Your Rights**

4.1. You have certain rights available to you in relation to your Personal Data processed by Bhago. Subject to applicable laws, you may exercise the following rights:

- (a) You have the right to request information about the Personal Data that Bhago processes about you. Certain information may not be disclosed where disclosure is restricted by law, including where Personal Data has been shared with authorities authorised to request such data for the prevention, detection, investigation, or prosecution of offences or cyber incidents.
- (b) You may request Bhago to correct, update, complete, or erase Personal Data that is inaccurate, incomplete, or no longer required for the purpose for which it was collected. You may also update certain information directly through your account on the Platform where such functionality is available. Bhago may retain certain Personal Data where retention is necessary for legal compliance, dispute resolution, fraud prevention, or other legitimate operational purposes. Where Personal Data forms part of system logs, backups, audit records, or other technical records, complete erasure may not always be technically feasible. In such cases, Bhago will take reasonable steps to restrict or anonymise such data where feasible.
- (a) Where Bhago processes your Personal Data on the basis of your consent, you have the right to withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of any processing carried out prior to the withdrawal. Please note that withdrawing consent may affect Bhago's ability to provide certain features or Services that rely on such Personal Data.
- (b) If you have any concerns or complaints regarding the processing of your Personal Data, you may submit a grievance through Bhago's designated grievance redressal mechanism. Bhago will acknowledge and respond to such grievances within a reasonable time from the date of receipt.

- (c) If you are not satisfied with the response received through Bhago's grievance redressal process, you may file a complaint with the Data Protection Board of India in accordance with the procedures prescribed under applicable law.
  - (d) You may nominate another individual who may exercise your rights under applicable data protection laws on your behalf in the event of your death or incapacity.
- 4.2. You may exercise your rights by writing to us at [ ] email.

## **5. Cookies and Other Tracking Technologies**

- 5.1. The Platform may utilise cookies and other similar technologies to collect certain technical information. Cookies are small text files consisting of alphanumeric characters that are placed on a user's device to collect information relating to activity on the Platform.
- 5.2. The technical information collected through such technologies enables us to analyse web traffic, administer and improve the Platform, and customise the Platform in accordance with user preferences. The use of cookies does not provide us with access to your computer or mobile device or to any information stored on such device, other than the information collected through the cookies themselves. You may choose to disable or restrict the installation of cookies by modifying the settings on your web browser. However, disabling cookies may limit certain functionalities of the Platform and may prevent you from fully utilising the features and Services available on the Platform. Our use of cookies and technical information assists us in improving the functionality, performance, and user experience of the Platform and Services. We may also analyse technical information that does not contain Sensitive Personal Information for the purposes of statistical analysis and identifying usage trends.

## **6. Data Retention**

- 6.1. We will retain your Personal Data for as long as your account remains active or for such period as may be necessary to provide the Services. We may also retain and use the Personal Data collected by us as necessary to comply with applicable legal or regulatory obligations, resolve disputes, enforce our contractual rights, or for other lawful purposes.
- 6.2. In the event that you cancel, deactivate, or unsubscribe from your account, Bhago shall not be under any obligation to retain your Personal Data except as may be required under applicable law. Notwithstanding the foregoing, Bhago may retain certain information relating to the User for the maximum period permitted under applicable law from the date of deactivation of the user's account.

## **7. Storage and Transfer of Information**

- 7.1. Your Personal Data will primarily be stored in electronic form; however, certain records may also be retained in physical form. We may collect, store, process, and use your Personal Data in jurisdictions outside India, subject to compliance with applicable laws.
- 7.2. We may engage third-party service providers, whether located within or outside India, to store or process your Personal Data on its behalf. Such third parties may maintain their own security standards for safeguarding Personal Data, and Bhago will, on a commercially reasonable basis, require such third parties to implement reasonable security measures to protect your Personal Data.

## **8. Grievance Officer**

- 8.1. If you have any complaints, concerns, or questions regarding the processing of your Personal Data, or if you believe that your Personal Data has been compromised or accessed without authorisation, you may contact Bhago's designated Grievance Officer using the contact details provided below. The Grievance Officer will review and address such complaints in accordance with applicable law and Bhago's internal grievance redressal procedures.

Name:  
Email:  
Contact Information:

**9. Miscellaneous**

- 9.1. This Agreement shall be governed by and construed in accordance with the laws of India, and the courts having jurisdiction at Chandigarh shall have exclusive jurisdiction over all disputes arising out of or in connection with this Agreement.
- 9.2. Bhago may, from time to time, undergo changes in its ownership or corporate structure, including through a merger, acquisition, restructuring, financing, or sale of assets associated with the Platform or the Services. In connection with such transactions, some or all of your Personal Data may be transferred to the acquiring entity, successor entity, or another entity involved in the transaction as part of the business assets.
- 9.3. In such circumstances, Bhago will take reasonable steps to ensure that any recipient of such Personal Data is bound to protect and process such data in a manner consistent with this Privacy Policy and applicable law. However, Bhago cannot guarantee that the acquiring or successor entity will have identical privacy practices or treat your Personal Data in exactly the same manner as described in this Privacy Policy.