

BEAM PRIVACY NOTICE DATED 23 April 2019

1. Introduction

Beam respects your privacy and is committed to protecting your Personal Data.

This privacy notice will inform you about how we collect, use, disclose, process, manage and transfer your Personal Data when you use our website and/or mobile app (regardless of where you visit it from), provide us with Personal Data, sending us an e-mail to an email address provided on our web site or sign up with us as a customer, supplier, contractor, applicant for a role as a member of our team with us, or as a Charger. It tells you also about your privacy rights.

The Glossary below sets out the meaning of some of the defined terms used in this privacy notice.

It needs to be read together with any other privacy notice or fair processing notice that we may provide on specific occasions and our Cookie Policy so that you are fully aware of how and why we are using your Personal Data. This privacy notice supplements those other notices and policies but it is not intended to override them.

Our website and app may include links to websites, plug-ins and applications of others. Clicking on those links or enabling those connections may allow Third Parties to collect or share your Personal Data or data about you. We do not control them and are not responsible for their activities as, when you leave our website, their own privacy policies will apply.

If you provide us your Personal Data through the Direct interactions (please see "Direct interactions" below) without indicating any refusal or objection, it would be presumed that you have read this privacy notice and agreed the content and our policies set forth in this privacy notice.

2. Who we are

Beam is made up of different legal entities, details of which can be found at www.ridebeam.com. This privacy notice is issued on behalf of the Beam Group so when we mention "**Beam**", "**we**", "**us**" or "**our**" in this privacy notice, we are referring to the relevant company in the Beam Group responsible for processing your Personal Data. Beam Mobility Holdings Pte Ltd is in all cases the controller and responsible for this website and our app.

3. Who manages privacy at Beam – our Data Protection Officer

We have a Data Protection Officer ("**DPO**") who is responsible for overseeing privacy at Beam. If you have any questions, comments or suggestions about how we collect, use or disclose your Personal Data or this privacy notice or would like to exercise your rights relating to your Personal Data which we retain, please contact our DPO using the details set out below or in the Other Jurisdictions section below.

Full name of legal entity: Beam Mobility Holdings Pte Ltd

Title of DPO: General Counsel

Email address: dpo@ridebeam.com

Postal address: 15 Beach Road #02-01, Singapore, 189677

You have the right to make a complaint at any time to the Personal Data Protection Commission in Singapore at www.pdpc.gov.sg or other relevant privacy regulator (as set out in the Other Jurisdictions section below). We would however appreciate the chance to deal with your concerns before you approach a privacy regulator so we encourage you to contact us first.

4. Changes to the privacy notice and your duty to inform us of changes

This version of our privacy notice was last updated 23 April 2019. This privacy notice may be modified from time to time. All communications, transactions and dealings with us shall be subject to the latest version of this policy in force at the time.

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5. Changes to your Personal Data

It is important that the Personal Data we hold about you is accurate, current, up-to-date and not misleading. Please keep us informed if your Personal Data changes during your relationship with us. Any submission of false or incorrect information may result in our failure to deliver the products and services you seek. You can access, update and correct your Personal Data anytime by accessing your account registered with us through the web site or mobile app. If you do not have an account with us, you can do so by contacting us (please see the "Who manages privacy at Beam" section above).

6. What Personal Data do we collect and how do we collect it

We may collect, use, store, process and transfer different kinds of Personal Data about you as follows:

Types and examples of your Personal Data	How we collect your Personal Data
<ul style="list-style-type: none">- <u>Identity and Profile Data</u><ul style="list-style-type: none">o Name, date of birth, gender, username, password, location, any survey or feedback responses received from youo If you are a Charger, or supplier, we may also collect national registration identity card, foreign identification number, passport details or work permit details.o If you are an applicant for a role with our team with us depending on the nature of the role being considered we may also collect details about your race or ethnicity, referees, career aspirations, curriculum vitae, work history, educational records and training, work performance, links to your professional profiles available in the public domains, your health (including details of any sick leave taken during your previous roles and any disability), details of any offences you have committed or are alleged to have committed, whether you are a member of any professional or trade associations or details required to monitor our compliance with equal opportunity policies.	<ul style="list-style-type: none">- <u>Direct interactions</u><ul style="list-style-type: none">o You may give us your Personal Data by filling and submitting forms, or by corresponding with us via telephone, letter, email, face-to-face meeting etc. This includes Personal Data you provide when you sign up to use our products or services or an account with us, or as a Charger or supplier, or you apply to us for a role as a member of our team or when you create an account with us including on our website or app.- <u>Automated technologies or interactions</u><ul style="list-style-type: none">o As you interact with our website or app, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, server logs and other similar technologies. Please see the Cookie section below for further details.- <u>Third parties or publicly available sources</u><ul style="list-style-type: none">o We may receive Personal Data about you from various third parties and public sources as set out below:- Identity and Profile Data, Contact Data and Technical Data from the following parties:<ul style="list-style-type: none">▪ analytics providers such as Google;▪ company websites;▪ any person and publicly available sources with professional relevance in order to conduct eligibility assessments or reference checking on applicants for a role with us or as a supplier to or Charger for us such as from references that you have provided or where you may be
<ul style="list-style-type: none">- <u>Contact Data</u><ul style="list-style-type: none">o Mailing or billing address, email address and telephone numbers	

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- **Financial and Transaction Data**
 - o Encrypted credit card detail and bank account details, payments to and from you, your orders of products/services from us
 - **Technical Data**
 - o Internet Protocol (IP) address, login data, your browser/device details and your time zone and location
 - **Usage Data**
 - o Details of your use of our website and app, and your use of our services including your location as you use our services or perform your services as a Charger or supplier to us or process your application for a role as a member of our team with us.
 - **Marketing Data**
 - o Your preferences in receiving marketing from us and third parties and your communication preferences
 - **Aggregated Data**
 - o We also collect, use and share aggregated data such as statistical or demographic data derived from your Personal Data (although this is not Personal Data if it does not directly or indirectly reveal your identity.) If we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data.
 - **Special categories of Personal Data**
 - o We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).
- recommended by a friend, former employer, former colleague or present employer or a names referred on your application form or CV
- advertising and social networks such as Facebook, Twitter, and LinkedIn; and
 - search information providers such as Google.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Adyen and insurance companies, professional services providers, cloud service providers and telecommunication providers.
 - Identity and Contact Data from data brokers or aggregators.

7. If you do not provide us with your Personal Data

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Where we need to collect Personal Data by law or under the terms of any contract we have with you and where you do not provide that Personal Data when requested, this may:

- (a) result in us not being able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or services requested or to pay you if you are a supplier or Charger).
- (b) result in us not being able to update you on our latest products, services and/or launches;
- (c) result in your inability to enter or participate in the activities organised by us.

In this case, we may have to cancel the product, service, supply, orders, accounts or transactions you have with us but we will inform you if this is the case at the time.

8. How we use your Personal Data and why

Generally we do not rely on obtaining your consent as our legal basis for processing your Personal Data (except for sending third party direct marketing communications to you via email or text message or, when required to by law, to transfer your data internationally). You have the right to withdraw consent to our or third party direct marketing at any time by contacting dpo@ridebeam.com.

Below we set out the ways we plan to use your Personal Data and the legal bases that we rely on to do so or where we have identified our Legitimate Interests in such processing.

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Please contact dpo@ridebeam.com if you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose.

If we need to use your Personal Data for an unrelated purpose, we will inform you and we will explain the legal basis which allows us to do so. We may also process your Personal Data without your knowledge or consent in compliance with law where this is required or permitted by law.

Purpose/Activity for collecting / using your Personal Data	Type of Personal Data	Our lawful basis for processing including any legal basis relying on our Legitimate Interest to process the Personal Data
To register you as a new customer, job applicant or a Charger or supplier, and provide account related services and support	(a) Identity and Profile (b) Contact	(a) Performance of Contract with you (b) Necessary for our Legitimate Interest (to assess your application for a role with us or as a Charger or supplier)
To process your transactions and deliver goods or services including: (a) managing payments, fees and charges (b) collecting or recovering money owed to us (c) providing you with customer support	(a) Identity and Profile (b) Contact (c) Financial and Transactional (d) Marketing	(a) Performance of Contract with you (b) Necessary for our Legitimate Interest (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms and conditions, contracts or privacy policies, cookie policies or notices	(a) Identity and Profile (b) Contact (c) Financial and Transactional (d) Marketing	(a) Performance of Contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our Legitimate Interest (to keep our records updated and to study how customers use our products/services)

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<p>(b) Asking you to leave a review or take a survey</p> <p>(c) Assessing your performance as a candidate for a role with us, or your application as a supplier or Charger</p>		<p>or your suitability for a role with us or as a Charger for or supplier to us)</p>
<p>To administer and protect our business and our website or app (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity and Profile (b) Contact (c) Technical</p>	<p>(a) Necessary for our Legitimate Interest (for running our business, provision of administration and IT services, network security, to prevent fraud or in the context of a business reorganisation or group restructuring exercise or sale of us or any part of us to someone else or to subcontract any of our services)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website and app content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity and Profile (b) Contact (c) Usage (d) Marketing (e) Technical</p>	<p>Necessary for our Legitimate Interest (to study how customers use our services or how our suppliers, job applicants or Chargers provide or will provide their products/services, to develop them, to grow our business and to inform our marketing strategy, to find suitable candidates for roles and to assess them)</p>
<p>To use data analytics to improve our website and app, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our Legitimate Interest (to define types of customers for our products and services or job applicants or Chargers needed to provide them, to keep our website and app updated and relevant, to develop our business and to inform our marketing and business strategy)</p>
<p>To make suggestions and recommendations to you about products or services that may be of interest to you or job vacancies and to assist you in finding a suitable role with us or to provide you with relevant news</p>	<p>(a) Identity and Profile (b) Contact (c) Technical (d) Usage</p>	<p>Necessary for our Legitimate Interests (to develop our products/services and grow our business)</p>

For all of the above, we may share your Personal Data with others as set out below for the purposes set out in the table above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this privacy notice.

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- Any person to whom we are compelled or required to do so under law or in response to a competent or government agency or court order or where necessary to protect, defend or enforce the rights of the Beam Group.

We require all Third Parties to treat your Personal Data in accordance with the law.

We may use automated decision making, including profiling, in certain circumstances, such as when it is in our Legitimate Interest to do so, or where we have a right to do so because it is necessary for us to enter into, and perform, a contract with you. We use profiling to enable us to give you the best service across the Beam Group, including specific marketing which we believe you will be interested in. You have the right not to be subject to a decision based solely on automated processing, including profiling, which has legal effects for you or affects you in any other significant way. If you are seeking to exercise this right, please contact us at dpo@ridebeam.com.

If you are interviewed or submitted as a candidate for a role with us, then this may involve the processing of more detailed Personal Data including sensitive data such as health, race or ethnicity information that you or others provide about you. Such information may be required to perform or qualify for a certain function for which you want to apply based on applicable laws in the jurisdiction in which you are based, which may provide the legal basis to process these data. In cases where there is no legal basis, we will ask for your express consent orally, by email or by an online process for the specific activity we require consent for and record your response. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing as set out in the 'Your privacy rights' section below.

9. Marketing and promotions from us or Third Parties

We may use your Identity and Profile, Contact, Technical, Marketing or Usage Data to form a view on what we think you may want or need, or what may be of interest to you or supplier or Charger services that may be needed. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased products or services from us, signed up with us as a customer, supplier or Charger or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your Personal Data with any Third Party outside of the Beam group of companies for marketing purposes.

10. Opting out of marketing and promotions

At any time you can ask us or Third Parties to stop sending you marketing messages by following the opt-out links on any marketing message sent to you or by contacting dpo@ridebeam.com. Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

11. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy which can be found on www.ridebeam.com.

12. International transfers

We share your Personal Data within the Beam Group. This may involve disclosing, transferring, storing, processing and/or dealing with your data outside of the country where it was collected.

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Many of our external third parties are based outside of the country where your Personal Data was collected so their processing of your Personal Data will involve a transfer of data internationally or as set out in the Other Jurisdictions section below.

Whenever we transfer your Personal Data internationally we ensure a similar degree of protection is afforded to it as required under the law of the country which it was collected.

Please contact dpo@ridebeam.com if you want further information on the specific mechanism used by us when transferring your Personal Data out of the country where it was collected.

13. Data security

We have security measures aimed to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We limit access to your Personal Data to those employees, agents, contractors and other Third Parties who have a business need to know where they are required to keep it confidential.

We have procedures to deal with any Personal Data breaches and will inform you and any applicable privacy regulator of a breach where we are legally required to do so.

14. How long we will retain your Personal Data

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers and supplier (including Contact, Identity, Financial and Transaction Data) for a minimum period (generally up to six years) after they cease being customers or suppliers for tax purposes. Further information in relation to retention period for your Personal Data is set out below in the Other Jurisdictions section.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

15. Your privacy rights

Under certain circumstances, you have rights under applicable privacy laws in relation to your Personal Data.

Please contact dpo@ridebeam.com if you wish to exercise any of your privacy rights.

You will not have to pay a fee to access your Personal Data (or to exercise any of your other privacy rights) however we may charge a reasonable fee if your request is without a legal basis, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. Your privacy rights include your right to be provided with clear, transparent and easily understandable information about how we use your information and your rights as below:

Request access to your Personal Data (commonly known as a "**data subject access request**"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.

Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

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Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with applicable law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your Personal Data where we are relying on a Legitimate Interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

16. Glossary

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). Please contact dpo@ridebeam.com if you want further information about how we assess our Legitimate Interests against any potential impact on you in respect of specific activities.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Personal Data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Internal Third Parties

Other companies in the Beam Group as set out on www.ridebeam.com.

External Third Parties

Service providers acting as processors (who may be based in the countries in which we operate as set out on www.ridebeam.com, or in the Other Jurisdictions section below, or in other countries) who provide IT and system administration services.

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, consultants, accountants, insurers, reference checkers or other financial or professional advisers (who may be based in the countries in which we operate as set out on www.ridebeam.com, or in the Other Jurisdictions section below, or in other countries) who provide consultancy, banking, legal, insurance, payroll or accounting or recruitment and reference checking services.

Third party logistic service providers with whom we share address and contact number for the purposes of facilitating the delivery of products purchased and/or services provided.

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Business partners and online affiliates that provide related services or products in connection with our business, including but not limited to the payment services, data storage, marketing, operations and customer service.

Any statutory authorities and industry regulators.

Our sub-contractors or third party service or product providers as we determine to be necessary or appropriate.

Any person to whom it is necessary to fulfil the above referenced purposes.

17. Other Jurisdictions

If our website or app is used by an individual in any country listed below, the below terms will apply as relevant.

Australia

For the purposes of this privacy notice, “**Personal Data**” will be deemed to have the meaning given to the term “**personal information**” under the *Privacy Act 1988* (Cth) of Australia (currently this is defined to mean any information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether or not the information or opinion is true, or opinion is recorded in a material form).

Except to the extent liability cannot be excluded by applicable law, we exclude all liability for any unauthorised access to, disclosure of, misuse of or loss or corruption of your Personal Data. Nothing in this Privacy Policy restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law including the Competition and Consumer Act 2010 (Cth) of Australia.

If you are in Australia, you may submit a complaint relating to your Personal Data or privacy rights to our Data Protection Officer who will respond to you within 30 days. If we have not responded to you within that time frame or you are not happy with our response, you may submit a complaint to the Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>.

Malaysia

For the purposes of this privacy notice, “**Personal Data**” will be deemed to have the meaning given to the term “**personal data**” under the *Personal Data Protection Act 2010* (PDPA) of Malaysia (currently this is defined to mean any information in our possession or control that relates directly or indirectly to an individual to the extent that the individual can be identified or are identifiable from that and other information in our possession, including any sensitive personal data as defined under the PDPA, which includes but is not limited to, information pertaining to the physical or mental health or condition of a data subject and religious beliefs). This privacy notice is provided in both English and Bahasa Malaysia (see below). In case of any inconsistencies between these two, the English version shall prevail.

New Zealand

For the purposes of this privacy notice, “**Personal Data**” will be deemed to have the meaning given to the term “**personal information**” under New Zealand’s *Privacy Act 1993* (currently this is defined to mean information about an identifiable individual).

Except to the extent liability cannot be excluded by applicable law, we exclude all liability for any unauthorised access to, disclosure of, misuse of or loss or corruption of your Personal Data. Nothing in this Privacy Policy restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law including New Zealand’s Consumer Guarantees Act 1993.

If you are in New Zealand, you may submit a complaint relating to your Personal Data or privacy rights to our Data Protection Officer who will respond to you within **20 working days**. If we have not responded to you within that time frame or you are not happy with our response, you may submit a complaint to the Office of the Privacy Commissioner at <https://www.privacy.org.nz/>.

Taiwan

For the purposes of this privacy notice, “**Personal Data**” will be deemed to have the meaning given to the term “**personal information**” under the *Personal Information Protection Act 2015 of Taiwan (R.O.C)* (currently this is defined to mean the name, date of birth, I.D. Card number, passport number, characteristics, fingerprints, marital status, family, education, occupation, medical record, medical treatment, genetic information, sexual life, health examination, criminal record, contact information, financial conditions, social activities and other information which may be used to identify a natural person, both directly and indirectly).

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The Identity and Profile Data regarding details about your health set forth in this privacy notice will not include medical record, treatment and health examination, unless we have your consent in writing or are otherwise required or permitted to by law. In addition, the Identity and Profile Data regarding details of any offences you have committed or are alleged to have committed set forth in this privacy notice will not include your personal criminal records, unless we have your consent in writing or are otherwise required or permitted to by law.

If you are in Taiwan (R.O.C), you may submit a complaint relating to your Personal Data or privacy rights to our Data Protection Officer who will respond to you within **15 working days**. If we have not responded to you within that time frame or you are not happy with our response, you may submit a complaint to the Taipei City Simple Petition System at <https://hello.gov.taipei/Front/main> or to Personal Information Protection Area of the National Development Council at <https://pipa.ndc.gov.tw>

South Korea

For the purposes of this privacy notice, “**Personal Data**” will be deemed to have the meaning given to the term “personal information” under the Korea “Personal Information Protection Act” or “the Act on Promotion of Information and Communications Network Utilization and Information Protection, Etc.”

This privacy notice is provided in both English and Korean. In case of any inconsistencies between the two, the Korean version shall prevail.

(a) Management of Personal Data

Details of the DPO for Korea are set out below:

Full name of legal entity: Beam Mobility Korea Co., Ltd.

Title of DPO: General Counsel

Email address: dpo@ridebeam.com

Postal address: 202-201, 47-3, Taebong-ro 42beon-gil, Gwangju-si, Gyeonggi-do, Korea

You have the right to make a complaint at any time to the Ministry of Public Administration and Security (<https://www.mois.go.kr>), the Communications Commission (<https://kcc.go.kr>) or the Korea Internet & Security Agency (<https://www.kisa.or.kr>).

If you wish to report any unauthorized disclosure of personal information, receive damage relief or consultation, you may receive also receive assistance from the following agencies:

- Unauthorized Disclosure of Personal Information Reporting Center (operated by KISA)
 - Responsibilities: Reception of reporting the cases of unauthorized disclosure of personal information, consultation services
 - Website: privacy.kisa.or.kr
 - Tel.: 118 (without telephone exchange number)
 - Address: (58324) Unauthorized Disclosure of Personal Information Reporting Center, 3rd Fl., 9, Jinheung-gil, Naju-si, Jeollanam-do, Republic of Korea (Bitgaram-dong 301-2)
- Personal Information Dispute Mediation Committee
 - Responsibilities: Personal information dispute mediation, Group dispute mediation (civil settlement)
 - Website: www.kopico.go.kr
 - Tel.: 1833-6972 (without telephone exchange number)
 - Address: (03171) 4th Fl., Government Complex-Seoul, 209, Sejong-daero, Jongno-gu, Seoul, Republic of Korea

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- Cyber Crime Division of Supreme Prosecutors' Office: 02-3480-3573 (www.spo.go.kr)
- Cyber Bureau of the Korean National Police Agency: 182 (<http://cyberbureau.police.go.kr>)

(b) Retention of Personal Data

In circumstances, we will retain Personal Data for the minimum period as set out in the following:

1) Any record on transactions, such as marks, advertisements and contents of the contracts and execution thereof as provided for in the Act on the Consumer Protection in Electronic Commerce

- Any record on marks or advertisements: 6 months
- Any record on cancellation of contract or order, payment, provision of services, etc.: 5 years
- Any record on settlement of consumer complaints or resolution of disputes: 3 years

2) Retention of any communication confirmation data under Article 41 of the Protection of Communications Secrets Act

- The date of telecommunications by subscribers; the time that the telecommunications commence and end; the subscriber number of the other party; the frequency of use; the data on tracing a location of the out-going base station: 1 year
- Computer communication, internet log history data, the data on tracing a location of connection: 3 months

(c) Deletion of Personal Data

We will delete Personal Data without delay when the personal information becomes unnecessary, such as at the expiration of the personal information retention period and achievement of the processing purpose.

Procedures and methods of Personal Data deletion are as follows:

1) Process of deletion

We select the Personal Data according to occurrence of the reason for deletion and delete the Personal Data with the approval of the DPO.

2) Method of deletion

For Personal Data recorded and stored in an electronic file format, we use the methods such as Low Level Format so that the record cannot be restored, and for Personal Data recorded and stored on paper, we shred the information with a paper shredder or incinerate such information.