

# Privacy Policy

Effective Date: 9 September 2025

## 1

### Introduction

This Privacy Policy is issued by Zippy Langebaan (PTY) Ltd (“Zippy”, “we”, “our”, “us”), registered in South Africa under company number 2024/555391/07, with its principal place of business at Western Cape, South Africa.

For purposes of the Protection of Personal Information Act, 2013 (POPIA), Zippy Langebaan (PTY) Ltd is the “Responsible Party” in respect of the personal information you provide to us or that we otherwise process in connection with our electric scooter and e-bike rental services (“Service”).

By using our mobile application (“App”) and/or our Service, you agree to the terms of this Privacy Policy.

## 2

### Information Collected

#### 2.1

##### Personal Information You Provide Directly

- Identification details – name, surname, date of birth, driver’s licence or learner’s licence details where required.
- Contact details – mobile phone number, email address, residential address.
- Account information – username, password, payment preferences.
- Payment details – billing address, payment card information (processed via secure third-party processors; we do not store full card numbers).
- Communications – records of correspondence via the App, email, phone, or other channels.

#### 2.2

##### Information Collected Automatically

- Geolocation data – GPS coordinates of your device and of the rented vehicle during the rental period.
- Vehicle telematics – battery level, lock/unlock status, trip start/end time, distance travelled.
- Device information – device type, operating system, unique device identifiers, IP address.

#### 2.3

##### Information Collected from Third Parties

We may collect personal information about you from:

- Payment processors for payment verification.
- Insurance providers for claims purposes.
- Law enforcement agencies or public databases for identity and eligibility verification.

## 3

### Purpose of Collection and Use of Personal Information

We process your personal information for the following purposes:

- To register and manage your account.
- To facilitate and manage scooter and e-bike rentals.
- To process payments and manage billing.
- To ensure compliance with applicable road traffic, safety, and consumer laws.
- To monitor, maintain, and improve the safety, performance, and availability of our Service.
- To communicate with you about your account, rentals, or changes to our policies.
- To investigate and resolve complaints, disputes, or fraudulent activity.
- To comply with our legal obligations.

## 4

### Whether Provision of Information is Voluntary or Mandatory and Consequences of Non-Provision

The provision of certain personal information (such as identification, contact, payment, and driver’s licence details) is mandatory in order for us to provide the Service to you. Failure to provide such mandatory information will result in our inability to create your account or allow you to rent a vehicle. Provision of other personal information is voluntary, but failure to provide it may limit certain features of the Service.

## 5

### Legal Basis for Processing and Authorisation to Collect

Collection and processing of your personal information is authorised by and necessary to:

- Comply with the Consumer Protection Act, 2008.
- Comply with the Electronic Communications and Transactions Act, 2002.
- Comply with the National Road Traffic Act, 1996 where applicable.
- Perform our contractual obligations to you under the Terms & Conditions.

## 6

### Recipients and Categories of Recipients of Personal Information

We may disclose your personal information to:

- Technology service providers – including Atom Mobility (platform provider), payment processors, and cloud hosting providers.
- Insurance providers – for processing of claims.
- Law enforcement agencies – when required by applicable law.
- Professional advisers – such as lawyers or auditors where necessary for legal or compliance purposes.

## 7

### Cross-Border Transfers of Personal Information

Your personal information may be transferred to and stored in jurisdictions outside South Africa, including the European Union, where our technology service providers (such as Atom Mobility) operate.

Where such transfers occur, we ensure that:

- The receiving country is subject to a determination of adequacy by the Information Regulator; or
- Appropriate contractual safeguards (such as standard contractual clauses) are in place; or
- The transfer is otherwise lawful under POPIA.

## 8

### Data Retention

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected or as required by law, after which it is securely destroyed or anonymised.

## 9

### Security Safeguards

We implement reasonable, appropriate technical and organisational measures to protect personal information against loss, damage, unauthorised destruction, and unlawful access. These measures include encryption, access controls, and regular security assessments.

## 10

### Your Rights under POPIA

You have the right to:

- Be informed about the personal information we hold about you.
- Request access to and a copy of your personal information.
- Request correction or deletion of your personal information.
- Object to the processing of your personal information in certain circumstances.
- Lodge a complaint with the Information Regulator at:

Website: <https://info regulator.org.za>

Email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

Requests to exercise your rights should be sent to our Information Officer at the contact details below.

## 11

### Changes to this Privacy Policy

We may amend this Privacy Policy from time to time. The latest version will be published in the App and on our website. Continued use of the Service after such changes constitutes acceptance of the amended policy.

## 12

### Contact Details

Responsible Party: ZipPy Langebaan (PTY) Ltd

Information Officer: Jonathan Kilroe Smith

Email: [jonks@clubmykonos.co.za](mailto:jonks@clubmykonos.co.za)

Phone: +27 (022) 707 7777

Address: Club Mykonos Resort | Mykonos Access Road, Langebaan | Western Cape | South Africa