

Legal Bases

To provide the HFX E-Scooters Services

As described in the [Terms of Service](#), the Services cannot be provided, and the Terms of Service cannot be performed, without HFX e-Scooters processing data about you including location data (for example, we need information about the location of any scooter while you are riding it and the routes taken by the scooter in order to provide the Services to you).

With your consent

We ask for your permission to process your information for certain purposes and you have the right to withdraw your consent at any time. We rely on your consent in the following situations:

- Where required, to send you marketing communications.
- When you link, connect, or login to HFS e-Scooters with a third-party service (e.g. Facebook). Such information may include your account ID or “handle” and information that you make available to us on that page or account.
- To receive information through the device-based settings you enable (such as access to your camera or photos), so we can provide the features and services described when you enable the settings.

When we process the data you provide to us based on your consent, you have the right to withdraw your consent at any time.

Legal obligation or for the establishment, exercise or defence of legal claims

We process information where we have a legal obligation to do so, for example, where we’re responding to valid requests from law enforcement and other government agencies for certain user information. We may be required to process your information to verify your driver’s license or identification, including to manage insurance, or to take action regarding illegal activities, traffic offences or violation of our Terms of Service. We may also have a legal obligation to share certain user information such as journey data with local government authorities pursuant to permits or licenses granted by these authorities to us. In addition, processing may be needed for us to establish, exercise or defend civil or criminal claims in connection with actual or potential litigation including to protect our Services, our property or other legal rights, including those of our users.

To protect vital interests

We process data where it is necessary to protect an interest which is essential to someone’s life or to protect any person from serious injury. This includes processing information to combat harmful conduct both on and off of our Services.

Carrying out a task in the public interest

Where envisaged by EU law or the law in an EU Member State, we may process data in the public interest. This may include protecting against harm and undertaking research for social good.

For the purposes of our legitimate interests

We process your information where it is necessary for our legitimate interests, and those of third parties, while applying appropriate safeguards that protect your privacy, rights and interests. We do this to:

- Manage our fleet of HFX e-Scooters scooters including to; ensure availability, to monitor usage levels and track juice (battery charge) levels.
- Collaborate with third parties where it is in our or their legitimate interests to use your information to pursue research and business projects. To do this, we remove certain identifiers, such as your name, phone, and e-mail address (where provided), and combine the resulting information with similar information from other users for use by HFX e-Scooters or our partners for research, business or other purposes. For example, HFX e-Scooters partners with universities and local government authorities to collaborate on research projects such as understanding traffic and travel patterns in a city.
- Improve our Services by conducting research or analytics such as what services or products users want or how users would like us to improve our Services so as to offer an innovative and accessible service. We may also, where necessary in our legitimate interests, use your information to understand how you use our Services and identify any issues so we can improve your navigation experience and those of others users.
- Keep the Services safe and secure by using information to detect, prevent or investigate violations of our [Terms of Service](#), fraud, illegality or abuse, and to prevent, detect or investigate unauthorised use of HFX e-Scooters scooters. We may also share information with third parties, including law enforcement and other government agencies for this purpose and pursuant to their legitimate interests in investigating, prosecuting and preventing crime.
- Promote the Services, including the conduct of marketing campaigns, to tell you about the various services we offer or to send you promotions.
- Understand and respond to your feedback.

You have the right to object to, and seek restriction of, our processing of your personal data based on our legitimate interests. You can exercise your right to object by emailing us at max@segwayns.com