

DATA STATEMENT

Non-personal Data

The EU Data Act is a key piece of legislation that governs data access and usage across the European Union. It aims to ensure fair and transparent data sharing practices, giving individuals and businesses more control over data generated by connected devices, including bikes.

At Swapfiets, we are committed to implementing solutions that comply with the EU Data Act. Our goal is to foster trust in data-driven services and support innovation.

For more information on the EU Data Act, you can follow this [link to the EU legislation](#).

Your Data, Your Control

On this webpage we describe how non-personal data is generated by connected components - and if applicable - corresponding apps on your connected bike. The non-personal data is processed for the legitimate purpose of providing you with important functionality of your bike and its connected components.

We aim to make the non-personal data generated by your bike more accessible and usable to you. In this context, we are committed to promoting data availability and access to the data generated by you and the connected components.

You can find additional details about the data generated by the connected components on your bike in the table below:

Point of collection	Type of information	Format	Estimated volume of data generated	Continuous and in real time data collection	Local or remote storage of data	Data retention period	Access and Management of Data
Information collected through Shimano E-bike Drive Unit	<ul style="list-style-type: none">• Device setting data• Riding related data• Usage history data not associated with riding• Fault related data	The product cannot provide data directly to users or third parties.	This product does not generate the relevant data at predetermined timing or intervals.	No	On the product (No data will be transferred to a remote server unless the user utilizes a separate app or equivalent software.)	The relevant data is stored on the product until it is updated.	Not available

Information collected through Comodule Bonnie & Clyde	<ul style="list-style-type: none"> • Device setting data • Riding related data 	JSON	Data points sampled on device every 10 seconds, sending sampled data to cloud every 4 minutes	The module samples the data on the device and sends it if it has connection to the cloud every 4 minutes	Both (local only temporary until offloaded to the cloud)	Until end of the subscription	Users can access, retrieve, and delete data
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* Swapfiets relies on the suppliers of connected components to provide timely and accurate information about the data generated by the connected components on your bicycle. The information above may be incomplete, and may be modified, added to, or supplemented as suppliers provide us with information about the data generated by the connected components on your bicycle.

** Please note that suppliers may develop additional applications that interact with one or more connected components. We kindly refer you to the provider of these applications for the data specifications.

The data processed by Swapfiets may be considered personal data, such as location data (in case of loss or theft). The generated data is processed in accordance with this EU Data Act statement and, insofar as it concerns personal data, in accordance with the Privacy Statement. For more information, please refer to our [Privacy Statement](#).

Your Data: How to Access and Share It

At Swapfiets, you have control over your data. Here's how you can request a copy of your non personal data and, if you wish, share it with a third party.

Requesting Your Non Personal Data

Would you like to receive a copy of the non personal data we process about your bike? Please fill in this [form](#).

In this form, we'll ask you to fill in your customer number and e-mail address. Before sending you a .csv file containing your non-personal data, we will verify the customer number and e-mail address combination.

Important for Personal Data: If the data you're asking us to transfer/share contains personal data (meaning it can identify someone), and you're not the person the data is about, we can only share it if there's a valid legal reason under GDPR (the main EU privacy law). When you make such a request, you must clearly state your legal



reason (like "consent" or "legitimate interest") for processing that personal data using the dedicated [form](#) here.

Sharing Your Data with a Third Party

You can simply forward the .csv file you receive from us to the party you wish to share the data with.

Contact

For more information on how we process your data when you use a connected bike, please visit help.swapfiets.com.

Changes

This statement was created on August 29, 2025. We may update this Data Statement from time to time. Changes to this Data Statement become effective when the revised statement is published.