

Privacy Policy

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This Privacy Policy applies to the VoltStation mobile app (the 'App'), the website voltstation.app (the 'Website') and the related services (the 'Services'), including account creation, Rental Orders, payments, customer support, partner enquiry forms and analytics where enabled. Not every processing activity applies to every user. Website visitors, for example, do not place Rental Orders unless they also use the App; app users do not necessarily use website cookies.

1. Who is responsible?

VoltStation B.V. is the data controller for the processing of personal data described in this Privacy Policy.

- Address: Straatweg 29, 8535 WG Follega, The Netherlands
- Email: support@voltstation.app
- Website: voltstation.app

Data Protection Officer (DPO). VoltStation does not currently meet the criteria set out in GDPR Article 37 that would require the appointment of a Data Protection Officer. No DPO has been appointed. For all privacy-related enquiries, contact support@voltstation.app.

2. What personal data do we process?

Depending on your use of the App, Website or Services, we process the following categories of personal data:

- **Account and contact details:** phone number, email address, optional name, account ID and login method.
- **Authentication data:** OTP verification data, sign-in via Apple or Google, authentication tokens and security metadata.
- **Rental Order and usage data:** start and end time of the Rental Order, Station ID/location, power bank ID, usage duration, pricing details, order status and return status.
- **Payment and transaction data:** payment method token, last four digits where available, mandate or authorisation identifiers, transaction IDs, amounts, status, refunds, chargebacks and unsettled payment status. We do not store full card numbers or CVV codes.
- **Location data:** only when you allow this in your device settings or browser settings. We use location to show nearby Stations and, where necessary, to investigate misuse or fraud.
- **Technical data:** IP address, device and app information, browser information, log files, crash logs, security logs, app events and pseudonymous identifiers where applicable.
- **Support and business communications:** support messages, partner enquiry forms, business contact messages, complaint details and related information you provide such as photographs or attachments.
- **Incident and CCTV data:** relevant CCTV footage and related incident information lawfully provided to VoltStation by a Partner Location following theft, vandalism, an accident, a safety incident or a reasonable suspicion thereof.
- **Referral Programme data:** referral codes, the account ID of the person who referred you or who was referred by you, coupon status and the status of the qualifying Rental Order. VoltStation does not send marketing communications to referred friends. The referral code or link is shared by the referring user themselves.
- **Website data:** cookie preferences, analytics consent status, page visits and partner enquiry or business contact form rate-limiting data.

3. Purposes and legal bases

We process personal data for the following purposes, each on the legal basis indicated in GDPR Article 6:

Performance of a contract (Article 6(1)(b) GDPR): creating and managing your Account; authenticating you; performing Rental Orders; processing payments, pre-authorisations, SEPA Direct Debit mandates and automatic collections; handling returns, replacement fees and disputes; providing customer support; and operating the Referral Programme.

Legal obligations (Article 6(1)(c) GDPR): retaining invoice and transaction data in accordance with statutory tax retention obligations and complying with lawful requests from authorities.

Legitimate interests (Article 6(1)(f) GDPR): security of the Services, App and Website; prevention of fraud, non-payment and abuse; operational monitoring and reporting, including Station performance analysis, rental statistics, verification and administration of Partner Compensation and financial reporting; customer support and service quality; investigation of theft, vandalism, accidents and safety incidents; insurance handling; establishment, exercise or defence of legal claims; service optimisation; and general business administration. We have balanced these interests against your privacy interests. The data used is limited to what is necessary, and users would reasonably expect a digital rental service to take appropriate measures for security, payment protection, operational control and incident handling. You have the right to object to processing on this basis.

Consent (Article 6(1)(a) GDPR): optional precise location where required by your device settings, analytics cookies on the Website, and marketing communications if and to the extent offered. You can withdraw consent at any time via your device, cookie settings or by contacting us.

Mandatory and optional data. To create an Account, you need one login identifier depending on the method you choose: a phone number, an email address, sign-in via Apple or sign-in via Google. To complete a Rental Order, VoltStation additionally requires your name, an email address and a supported payment method. Without this information, VoltStation cannot create your Account, process payment or conclude and perform the rental contract. Other data, such as precise location and analytics cookies, is optional unless needed for security or legal claims.

Rule-based checks. We may use rule-based checks to prevent fraud, non-payment and misuse, for example by temporarily restricting new Rental Orders where payments have not yet settled or where a preset limit for unsettled Rental Orders has been reached. These checks are not used for marketing profiling and are intended for payment security, service security and abuse prevention. VoltStation does not use automated decision-making or profiling within the meaning of Article 22 GDPR that produces legal effects or similarly significantly affects you without human review where required by law.

4. With whom do we share data?

We only share personal data where necessary for the Services, security and payment processing, Website operation, operational support, or where we are legally obliged to do so. Where applicable, VoltStation uses the following recipients and service providers.

Main service providers

Hetzner Online GmbH. Hetzner provides hosting of the core backend, rental service infrastructure and related server-side components. This may involve account data, Rental Order data, technical logs and support-related technical data.

Shenzhen Besiter Power Bank Co., Ltd. Besiter is VoltStation's technology supplier for the power bank rental service, including hardware integration, software, backend support, maintenance and technical troubleshooting. Where necessary for support or maintenance, this may involve account data, Rental Order data, Station and power bank identifiers, system data, logs, support data and other personal data needed for the relevant technical issue.

Stripe Technology Europe, Limited. Stripe processes payments, pre-authorisations, SEPA Direct Debit setup and collection, refunds, chargebacks, fraud prevention and payment compliance. This may involve payment method tokens, transaction IDs, amounts, charge status, refunds, chargebacks, payment-related identifiers and limited contact data.

Bird B.V. Bird sends SMS verification codes and delivery-status messages. This may involve phone numbers, OTP message content, delivery status and technical metadata.

AC PM, LLC (Postmark). Postmark sends email verification codes and transactional emails. This may involve email addresses, OTP or transactional message content, delivery status and technical metadata.

Google Cloud EMEA Limited. Provides Google Firebase / Google Cloud, Google Maps Platform and Google Workspace / Gmail SMTP services where used. These services may support app infrastructure, authentication, security, crash reporting, error analysis, push or app services, maps, routes, nearby Station functionality, support emails, partner enquiry routing and internal communication. Depending on the service used, this may involve account IDs, app and device data, crash logs, error reports, IP addresses, pseudonymous identifiers, map interaction data, location data if enabled by the user, names, email addresses, business names, message content and attachments where provided.

Apple and Google sign-in services. If you choose to sign in using Apple or Google, the relevant sign-in provider may process your account identifier, email address or relay email, name where provided and authentication metadata.

Vercel Inc. Vercel provides Website hosting, CDN/edge delivery and security logging for the public Website. This may involve IP addresses, request headers, user agents, page URLs and technical request logs.

Upstash, Inc. Upstash is used for rate limiting and abuse prevention for partner enquiry and business contact forms. This may involve one-way hashes of IP addresses and email addresses, counters and technical metadata. The data store is configured in Frankfurt, Germany where applicable.

Google Ireland Limited (Google Analytics 4). Where you give analytics consent, Google Analytics 4 is used for Website analytics, traffic measurement and service optimisation. This may involve page events, user agent information, approximate technical data, analytics identifiers and IP addresses to the extent processed by Google for the request.

Partner Locations. Partner Locations are not responsible for Rental Orders. Through the Partner Account, a Partner Location may view limited information for Rental Orders started at its Station: order ID, order amount and order start time. This information is used for operational monitoring, verification of Partner Compensation, financial reporting and support. Partner Locations do not receive users' names, contact details, complete profiles or payment details.

CCTV footage from Partner Locations

Where legally permitted and reasonably necessary, a Partner Location may provide relevant CCTV footage to VoltStation following theft, vandalism, an accident, a safety incident or a reasonable suspicion thereof. VoltStation processes this footage as an independent controller for incident investigation, safety, fraud prevention, insurance handling and the establishment, exercise or defence of legal claims. The Partner Location remains independently responsible for the lawfulness of its CCTV use and disclosure of the footage to VoltStation.

Public authorities and legal requests. We may share data with public authorities, courts, regulators, legal advisers or other parties where this is required by law, necessary for legal proceedings or necessary to protect our rights. In those cases, we share only the data necessary for the relevant request or procedure. We enter into data processing agreements with processors where required by GDPR Article 28. For international transfers outside the EEA, we use appropriate safeguards such as Standard Contractual Clauses where required.

5. Data location and transfers outside the EEA

Server location. The core rental service, including the backend used by the mobile application and related server-side components, is hosted by Hetzner Online GmbH on servers located in Falkenstein, Germany, within the European Economic Area (EEA). VoltStation has entered into a Data Processing Agreement with Hetzner Online GmbH, including appropriate technical and organisational measures for the protection of personal data.

Website services. The public Website may use Vercel, Google Analytics 4, Google Workspace/Gmail SMTP and Upstash, Inc. as described above. Depending on the service and configuration, these providers may process technical request metadata, partner enquiry or business contact form contents, or analytics data outside the EEA, including in the United States. Where required, this is covered by contractual safeguards such as Standard Contractual Clauses or other legally available transfer mechanisms. Google Analytics is loaded only after you grant analytics consent via the cookie banner.

Technology supplier and technical support provider. We use Shenzhen Besiter Power Bank Co., Ltd., located in China, as our technology supplier for the power bank rental service, including hardware integration, backend support, maintenance and technical troubleshooting. Authorised personnel of this supplier may have administrator-level access to the backend environment and may therefore be able to access system data, logs and personal data where necessary to diagnose, maintain or resolve technical issues. Where this access involves a transfer of personal data to China within the meaning of GDPR Article 44, VoltStation relies on Standard Contractual Clauses under GDPR Article 46 and applies access restrictions, confidentiality obligations, logging and data minimisation measures.

Payment processing. Payment data is processed by Stripe Technology Europe, Limited. Stripe infrastructure and subprocessors may be located partly outside the EEA. Stripe addresses international transfers through Standard Contractual Clauses or other applicable safeguards.

Requests and information. If you wish to know more about our data transfer arrangements or request a copy of the applicable safeguards, contact support@voltstation.app. Commercially confidential information may be redacted where permitted by law.

6. Retention periods

We do not retain personal data longer than necessary for the purposes for which it was collected. The following indicative periods apply:

- **Transaction and invoice data:** retained for 7 years in accordance with Dutch statutory tax retention obligations.
- **Account data:** retained for the duration of your active Account and for up to 2 years after Account closure where necessary to handle outstanding claims, disputes, fraud prevention, payment issues or regulatory obligations.
- **Support communications:** retained for 12 months after resolution of the relevant enquiry, after which they are deleted or anonymised unless longer retention is necessary for a dispute, safety issue or legal claim.
- **Security and access logs:** retained for a maximum of 6 months, unless longer retention is necessary to investigate a specific security incident, misuse, payment dispute or abuse case.
- **CCTV footage received in connection with an incident:** deleted once the relevant incident has been resolved and normally no later than 12 months after receipt, unless longer retention is necessary for an insurance matter, ongoing investigation, legal obligation or legal claim.
- **Referral Programme data:** retained until the relevant coupon has been used or has expired, plus up to 6 months to handle disputes or abuse investigations.
- **Location data:** used in real time to show nearby Stations and not retained beyond the active session unless required for fraud, misuse, safety or dispute investigation. In that case, location data is retained for a maximum of 6 months, unless longer retention is necessary for a legal claim.
- **OTP and transactional message data:** retained for up to 12 months, unless the relevant provider deletes the data earlier or longer retention is necessary for verification, security, delivery diagnostics, dispute handling or legal obligations.
- **Website partner enquiry or business contact form rate-limiting data:** retained for 10 minutes for IP-based counters and 24 hours for email-based counters.
- **Cookie preference storage:** retained for up to 13 months.
- **Analytics cookies and identifiers:** where analytics consent is given, the Google Analytics cookies expire after 13 months.

7. Security

We take appropriate technical and organisational measures to protect personal data against unauthorised access, loss or misuse. These measures include access controls, encryption in transit where appropriate, logging, security monitoring, role-based access, supplier confidentiality obligations and data minimisation. No system is 100% secure. If you suspect your Account has been misused or a security issue has occurred, contact us immediately.

8. Your rights

Under the GDPR you have the following rights: access to your personal data; rectification of inaccurate data; erasure; restriction of processing; objection to processing; data portability; and, where applicable, withdrawal of consent. You can submit a request by emailing support@voltstation.app. We may ask for additional information to verify your identity before fulfilling a request.

Account deletion. You can request Account deletion via the App where available or by contacting us. When you request Account deletion, we will close or deactivate your Account where possible. We may retain and continue processing the minimum personal data necessary to handle outstanding charges, unsettled payments, disputes, fraud prevention, security incidents, legal claims and statutory retention obligations. Unused Referral Programme coupons may expire when the Account is closed.

Supervisory authority. You also have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens), Postbus 93374, 2509 AJ Den Haag, or via www.autoriteitpersoonsgegevens.nl.

9. Cookies and similar technologies

Mobile app. The VoltStation mobile app does not use web-based cookies in the same way as a website. The app may use device identifiers, local storage, SDK identifiers and similar technologies for session management, authentication, security, crash reporting, fraud prevention and app functionality.

Website. The VoltStation website uses cookies and similar technologies for essential functionality, security and cookie preference storage. Essential cookies are required for basic site functionality and security and do not require consent. With your consent, the Website uses Google Analytics for analytics, traffic measurement and service optimisation. VoltStation does not use cookies or similar technologies for advertising or behavioural profiling. Where analytics consent is given, the Website uses Google Analytics cookies that expire after 13 months. You can change or withdraw your analytics consent at any time via cookie settings in the Website footer.

10. Changes

We may update this Privacy Policy. The most current version is available in the App and/or on voltstation.app. In case of material changes, we will inform you via the App, website and/or email where appropriate.

Language. This document is available in Dutch and English. If there is any discrepancy or inconsistency between versions, the Dutch version prevails.