## **Comparison of Scooter Privacy Policies\***

	BIRD	LIME	SPIN
Visible Privacy Policy?	Not linked in app	Linked behind help page	Linked behind help page
Explicit review and consent to Privacy	No	No	No
Policy at onboarding?  Location tracking throughout rides?	Yes	Yes	Yes
Requires government officials to get a warrant for user data?	No	No	No
Dedicated privacy contact?	No	No	No
Prompts Facebook login?	No	Yes	Yes
Shares data with 3 <sup>rd</sup> parties for ads?	Not clear	Not clear	Not clear
Honors Do Not Track?	No	No	Doesn't say
Explicit data breach procedures?	Doesn't say	Doesn't say	Yes
Explicit protections for data collected from minors?	Doesn't say	Yes	Yes
Internal data security policies?	Doesn't say	Doesn't say	Yes – employees have restricted access to personally identifiable information
Mention of payment card security?	No	No	In app: "Your payment information is stored with bank level security"

<sup>\*</sup>Chart is based on analysis of the August 1, 2017 <u>privacy policy of Bird</u>, the July 13, 2018 <u>privacy policy of Lime</u> and the June 7, 2018 <u>privacy policy of Spin</u>.