BORNAGE PRIVACY POLICY

Final version — 4 November 2026

1. Data controller

The data controller and publisher is UMBLE Ltd, a British company owned by residents of the European Union, located at 128 City Road, London, EC1V 2NX, United Kingdom (the “Publisher”).

Privacy contact: business.contact@umbleltd.com.

The Bornage application (the “Bornage Application”) is a mobile application dedicated to locating electric-vehicle charging stations, assisting with station selection, providing charging estimates, planning EV routes and providing navigation, including through compatible Android Auto and Apple CarPlay interfaces.

This policy explains how the Publisher processes personal data in connection with the Bornage Application and its services.

2. Personal data we may process

Depending on the features used, the Publisher may process the following categories through the Bornage Application:

- account and identification data: email address, account identifier, authentication information and session status;
- vehicle profile data: model, battery and charging characteristics, connectors and selected vehicle;
- charging preferences: objectives, declared state of charge, preferred power or connectors, excluded operators, pricing preferences and charging cards or passes added to the wallet;
- places and searches: searched addresses, destination, starting point and saved places such as home or work where the user chooses to save them;
- location data: approximate or precise position, direction, speed and data required to follow a journey, depending on permissions and device capabilities;
- planning and navigation data: requested route, waypoints, charging stops, road preferences, departure and arrival battery levels, journey progress and navigation-session status;
- community contributions: reports, confirmations, assistance information and other content voluntarily submitted;
- technical and diagnostic data: device model and operating system, Application version, language, network status, technical events, errors, performance data and logs required for security and troubleshooting;
- usage data: features viewed, searches, station interactions and use of Ideal Station, route planning and navigation;
- support data: the content of requests and support communications.

3. Purposes and lawful bases

The Publisher processes data through the Bornage Application for the following purposes:

Purpose	Main data	Intended lawful basis
Create and secure the account, maintain the session and provide requested features	account, authentication, preferences	performance of the requested service
Show nearby stations, calculate routes and provide navigation	location, starting point, destination, route	performance of the requested service; system permission and consent where required
Plan an EV journey and suggest charging stops	vehicle, battery, route and charging preferences	performance of the requested service
Synchronise navigation with Android Auto or CarPlay	destination, route, progress, language and navigation status	performance of the user-requested service
Personalise results, Ideal Station and estimates	vehicle, preferences, charging-card wallet, location or chosen place	performance of the requested service
Save chosen places, journeys or settings	places and preferences	performance of the requested service

Purpose	Main data	Intended lawful basis
Receive and display community contributions	report, position or area, account where required	performance of the service and legitimate interests in improving information, depending on the feature
Secure, diagnose and improve the Application	technical data, errors and usage events	legitimate interests in maintaining a safe and reliable service; consent where required
Respond to support and rights requests	contact details and request content	performance of the service and legal obligations
Comply with law and prevent abuse	account, security and relevant logs	legal obligation or legitimate interests

Where optional processing is based on consent, consent may be withdrawn at any time without affecting prior lawful processing. Refusal may, however, make the corresponding feature unavailable.

4. Location and background navigation

Location is used to show nearby stations, determine a starting point, follow progress, recalculate a route and maintain navigation requested by the user.

During active navigation, location may continue to be used while the screen is locked, while the Application is in the background, or while Android Auto or CarPlay displays the route. On compatible systems, a persistent indicator or notification may show that this is occurring.

Navigation and related tracking stop when the user ends the session, subject to the short technical time required to shut down. The Bornage Application is not used to track location continuously outside a feature actively requested by the user.

Users may refuse or withdraw location permission through device settings. This may prevent nearby-station display, guidance or route recalculation. An address may be entered manually where that option is available.

5. Route planner

To calculate an EV route, the Bornage Application may send to the routing engine or its providers the coordinates of the starting point, destination and waypoints together with necessary parameters, including vehicle profile, declared battery level, charging objectives and road and charging preferences.

Drafts, recent routes or preferences may be stored locally on the device or synchronised with the account where the feature provides this. A place identified as “current location” may be recalculated at departure rather than stored as a fixed address.

6. Android Auto and Apple CarPlay

When compatible equipment is connected, the Bornage Application may send the vehicle component information strictly necessary to display and continue navigation, including destination, title or address, coordinates, planned stops, progress, instructions, language and active or stopped status.

Some information may be stored temporarily on the phone to resume navigation after reconnection. The development and operation of Android Auto and Apple CarPlay necessarily rely on the technical foundations, software components and interfaces supplied respectively by Google and Apple, as well as those of the phone operating system and compatible vehicle. Those parties may therefore process information required for their own technologies under their terms and policies. The Publisher does not control processing they carry out independently for their own purposes.

7. Usage analytics, diagnostics and continuous improvement

The Publisher uses technical tools to diagnose the service, identify and correct defects, analyse the detailed performance of the Bornage Application and each of its features, improve stability, and continuously improve the user experience. Depending on configuration, these tools may include PostHog, Google/Firebase services and Mapbox mapping or navigation components.

Events may contain the Bornage Application version, platform, language, guest or authenticated status, feature used, technical identifiers, performance measurements and certain route or station characteristics. These analyses are used to understand the service’s operation in detail, detect difficulties affecting each feature, and deliver continuous fixes and improvements.

8. Recipients and providers

The Publisher does not sell any personal data belonging to users of the Bornage Application. Any access or transfer takes place only within a lawful framework and to the extent necessary to perform the requested service, operate, secure or improve it, or comply with the Publisher’s legal obligations.

Data may be made available, to the extent necessary, to:

- UMBLE Ltd and authorised persons involved in operating and supporting the Bornage Application;
- hosting, database, authentication, messaging, analytics, diagnostic and security providers;
- mapping, search, routing and navigation providers, including Mapbox depending on the features used;
- Google, Apple and system components for Firebase, Android Auto, CarPlay or relevant platform services;
- authorities or professional advisers where required by law or to protect legal rights.

9. Retention

Personal data is retained only for as long as necessary for the relevant purpose and is then deleted, anonymised or archived where a legal obligation requires this.

The duration depends on whether an account remains active, use of the feature, withdrawal of consent, backup periods, the need to secure the service, handle a request or meet legal obligations. Local data may remain until deleted in the Application, the Application’s data is cleared, or it is uninstalled.

10. International transfers

Because UMBLE Ltd is established in the United Kingdom and providers may process data in other countries, international transfers may occur. Where the GDPR or UK data-protection law applies, transfers are covered by a recognised mechanism, such as an adequacy decision, standard contractual clauses or another legally recognised safeguard.

Information about applicable safeguards may be requested through the contact address, subject to protection of confidential information.

11. Security

The Publisher implements reasonable technical and organisational measures intended to protect data processed through the Bornage Application against unauthorised access, alteration, loss or disclosure. No system is completely risk-free. Protecting the device, account and authentication methods and installing available security updates are also the user’s responsibility.

12. Individual rights

Depending on applicable law, users may have rights of access, rectification, erasure, restriction, objection, portability and withdrawal of consent. They may request information about transfers and complain to the competent supervisory authority, including the CNIL in France or the ICO in the United Kingdom where either has jurisdiction.

Requests may be sent to business.contact@umbleltd.com. Reasonable proof of identity may be requested only where necessary to avoid disclosing data to another person.

13. Account deletion

Users may request account deletion through the methods provided in the Application or by contacting the Publisher. Some data may be retained where required by law, to establish or defend legal rights, or for security. Deletion may not immediately remove backup copies, which are purged according to their normal cycle.

14. Automated decisions

The Bornage Application may rank or recommend stations and routes using selected parameters. These recommendations assist the user but do not, by themselves, produce legal or similarly significant effects. Users remain free to choose another station or route.

15. Children

The Application is not intended for persons under 18. If a child’s data has been submitted without appropriate authority, the relevant representative may contact the Publisher.

16. Changes to this policy

This policy may be updated to reflect changes to processing or applicable law. The new date will appear at the beginning. Where required, users will be informed before a material change and renewed consent will be requested where the lawful basis requires it.

17. Contact

Questions and requests concerning personal data may be sent to business.contact@umbleltd.com.

18. User testing and beta programme

In connection with improving the Bornage Application, the Publisher may use the email address of certain users to invite them occasionally to take part in feature tests, a beta programme, interviews or questionnaires.

These invitations and any related participation are entirely free of charge, voluntary and non-commercial and non-promotional in nature. They have no effect on access to the Application or on the user’s account.

This processing is based on the Publisher’s legitimate interests in testing, evaluating and improving the Application. Users may object at any time, easily and free of charge, to receiving further invitations of this kind, including by using the link provided in each message.