

# SPIN

APPLICATION MATERIALS

# Shared Mobility Pilot Program Request for Applications

City of Santa Monica

Peter Dzewaltowski, Transportation Planner  
Mobility Division, Planning and Community Development  
City of Santa Monica  
ATTN: Shared Mobility Pilot Program Application  
1685 Main Street, Room 115  
Santa Monica, CA 90401



July 27, 2018

**Spin**  
**188 King Street, #203**  
**San Francisco, CA 94107**

***Contacts:***

**Kyle Rowe**  
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**(206) 965-5258**

**Brian Kyuhoon No**  
**brian@spin.pm**  
**(720) 394-5532**



# Intent



## Describe the overall vision for the service

Spin is a San Francisco-based personal mobility company that seeks to help cities and campuses reduce their dependence on cars by offering an affordable, accessible, and sustainable form of personal transportation. To achieve this, Spin takes a different approach than others in our industry: We believe dockless mobility can only work in the United States in the long run by doing it responsibly and in constant collaboration with our city partners.

In the dockless mobility space, an industry still in its infancy, we believe Spin is the only company that has consistently demonstrated our commitment to doing dockless mobility the right way – in a way that is responsible and safe and that makes sense for our community. We approach each and every city and campus through the lens of a partnership, and we strive to do the same in Santa Monica.

Our interest is not deploying more scooters than are needed but to ensure a sustainable model that the City, its residents, and its visitors can depend on – a mobility service that is responsive to its community. That is why we have been deliberate in not trying to replicate the overseas practice of deploying as many scooters or bikes as possible in a given area (often without permission) – a practice that we unfortunately see every other company copying.

That is why we are proud to have led the industry in developing and shaping the regulatory framework for dockless mobility in the United States, not with the aim of going unregulated but with the aim of providing good-faith policy proposals to balance public and private interests. These policies, which our team has either created or advocated for, have now been adopted by local governments across the country include caps on fleet sizes, the mechanism with which to enforce such caps, and robust data-sharing requirements.

For us, collaborating with cities is not just lip service but is something that is in our company's DNA and why our entire government partnerships and policy team is comprised of people with public-sector transportation experience. We believe any new mobility option, such as scooters, requires a City with whom we can partner to regularly gauge and make adjustments based on our shared experiences. In Santa Monica, we see such a partner.

Our commitment to forging true partnerships is evidenced by our industry leadership in developing common-sense regulations and policy proposals, our references, and our ability to provide cities and campuses with a mobility solution that fits the needs of each community – not a one-size-fits-all solution. In fact, we are proud that -- when able to choose -- Spin most often emerges as the preferred operator for cities and campuses. We would encourage the City to contact their counterparts in cities with multiple dockless-mobility companies, where we believe our model of true government collaboration would yield acknowledgment.

We are excited about the opportunity to work with Santa Monica to ensure a safe, responsible scooter-share system. It is our hope that our actions across the country speak louder than the words of some in the industry – and demonstrate to the City our commitment to doing dockless right way.

At Spin, we believe in communities where people come first, not just cars, and where citizens have access to more affordable, sustainable, and equitable means of shared mobility. We hope to build this future with Santa Monica.



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# Operator Information



**a. Project team, including biographies and qualifications of lead team members. Include an org chart that includes the entire company as well as the local team.**

## Project Team

While Spin was founded relatively recently, the combined experiences of our core team in dockless mobility – as well as in shared-use mobility, transportation safety, and urban planning – span many years. Harnessing the team's background, as well as Spin's commitment to a partnership-first approach, Spin has become a leading dockless mobility company in the United States.

### *Project Principals*



**Kyle Rowe**  
**Head of Government**  
**Partnerships**

Kyle leads Spin's growth into new markets by partnering with local governments and engaging with stakeholders, including collaborating with transportation agencies on how best to utilize dockless mobility data and to help integrate Spin's dockless mobility services into the broader transit network. Before joining Spin, Kyle served as a Strategic Advisor at the Seattle Department of Transportation, where he managed the city's station-based bikeshare system and where he authored the nation's first dockless mobility regulations, which have since been relied on by nearly every city and campus seeking to implement its own framework for dockless mobility programs.



**Brian Kyuhoon No**  
**Head of Public Policy**

Brian spearheads Spin's industry-leading efforts to develop dockless mobility regulations in the United States, collaborating with cities of all sizes to craft policies that work in the interest of each community. Many of these policies have become the standard for U.S. cities seeking to regulate dockless mobility, including caps on the number of companies and their fleet size to mitigate negative impacts on the public right-of-way, as well as enforcement mechanisms for cities to prevent bad industry behavior. Before Spin, Brian worked on the U.S. Senate Committee on Commerce, Science, and Transportation, where he developed policies and

drafted legislation on transportation safety, consumer product safety, and data security and online privacy.



**Matt Sink**

**Head of Scooter  
Operations**

As Head of Scooter Operations, Matt drives operational strategy, product development, and market expansion for Spin's scooters. In his role, he oversees Spin's general managers in markets where Spin operates scooters. Matt has deep experience in building efficient operation teams that run efficiently and effectively, and he believes strongly in maintaining a collaborative relationship with city policymakers in their efforts to make transportation more reliable and available to all. Before Spin, Matt worked at Uber in Latin America, launching and managing key markets such as Rio de Janeiro.

*Project Launch Manager*



**Charlie Thames**

**Operations Manager**

In his role as one of the company's most experienced operations managers, Charlie leads and manages Spin's launches in new cities, implementing go-to-market strategies. His experience in launching or managing dockless mobility operations include Seattle and San Francisco. When launching new markets, Charlie focuses on process development and operational efficiency, tailoring operations to meet the needs of each community. To ensure user and city satisfaction, he constantly reviews feedback and evaluates previous initiatives. As the Project Launch Manager for the City of Santa Monica, Charlie will also handle all facets of hiring and training a local operations team. Before joining Spin, Charlie ran a small business and studied management at the University of Minnesota.

*Project Support***Ben Bear****VP of Business  
Development and Policy**

Ben is responsible for overseeing Spin's expansion efforts with both cities and campuses. Before joining Spin, Ben was the founding VP Sales of Vungle, a Google Ventures-funded mobile marketing startup with more than \$300M in annual revenues. Joining as one of the first 10 employees at Vungle, he grew his team from two to 55 full-time employees in five countries. Most recently, Ben was the CEO & founder of WorkGenius, a 500 Startups-backed startup that matched workers in the sharing economy with job opportunities at partner companies like Instacart and DoorDash. Ben began his career in Chicago, where he worked as a political consultant for the Strategy Group after graduating from nearby Northwestern University.

**Derrick Ko****CEO and Co-Founder**

Derrick was formerly a growth product manager at Lyft by way of acquisition of a Y Combinator company, Kicksend, where he was the first employee. He previously was a lead at Pivotal Labs – where he worked with Rakuten and IDEO – and had stints at Microsoft and Hewlett-Packard. As CEO of Spin, Derrick oversees all of the company's dockless mobility operations. He graduated from Purdue University with a B.S. in Computer Engineering.



## Kyle Rowe

Head of Government  
Partnerships

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 [spin.pm](http://spin.pm)

 [facebook.com/ridespin](https://facebook.com/ridespin)

 [instagram.com/ridespin](https://instagram.com/ridespin)

 [twitter.com/ridespin](https://twitter.com/ridespin)

## EDUCATION

### University of Washington

*Bachelor of Arts Community, Environment, and  
Planning*

## WORK EXPERIENCE

### Spin

*Head of Government Partnerships* | Oct. 2017 – Present

- Lead Spin's growth into new markets through government relations, stakeholder engagement, and strategic business.
- Develop new ways to collaborate with local transportation agencies to best utilize bike share data and integrate bike share with the transit network.
- Analyze industry's policy trends and incorporate findings into product development.

### Seattle Department of Transportation

*Strategic Advisor* | Oct. 2012 – Oct. 2017

- Authored North America's first regulatory framework for dockless mobility.
- Managed contract to operate Pronto Cycle Share, and negotiated the contract for an e-bike system to replace Pronto.
- Prioritized, planned, and designed complete street projects focusing on pedestrian and bicycle improvements on arterials.
- Managed multiple programs including bicycle parking, annual bike map design and production; served as the liaison to the Seattle Bicycle Advisory Board.
- GIS analyst for the 2014 update to Seattle's Bicycle Master Plan.

### BDS Planning & Design

*Associate Planner* | Apr. 2012 – Sep.. 2013

- Managed complex property and parcel datasets on to analyze potential creation of business improvement areas.
- Visualized data analysis with maps for facilitation of neighborhood business stakeholders.
- Managed the U District Livability Partnership contract and contributed to writing the U District's Strategic Plan.



## Brian Kyuhoon No

Head of Public Policy

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 [spin.pm](http://spin.pm)

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 [instagram.com/ridespin](https://instagram.com/ridespin)

 [twitter.com/ridespin](https://twitter.com/ridespin)

## EDUCATION

### Princeton University

*Bachelor of Arts Politics, Certificate in American Studies*

## WORK EXPERIENCE

### Spin

*Head of Public Policy* | May 2017 – Present

- Led Spin's industry-leading efforts to develop the first dockless mobility permit programs
- Work with local governments and campuses to develop the right policy or regulatory framework for their community
- Serve as point of contact, along with other policy team members, for government officials in all of Spin's markets.
- Led Spin's regulatory approval efforts in nearly all of Spin's partner cities

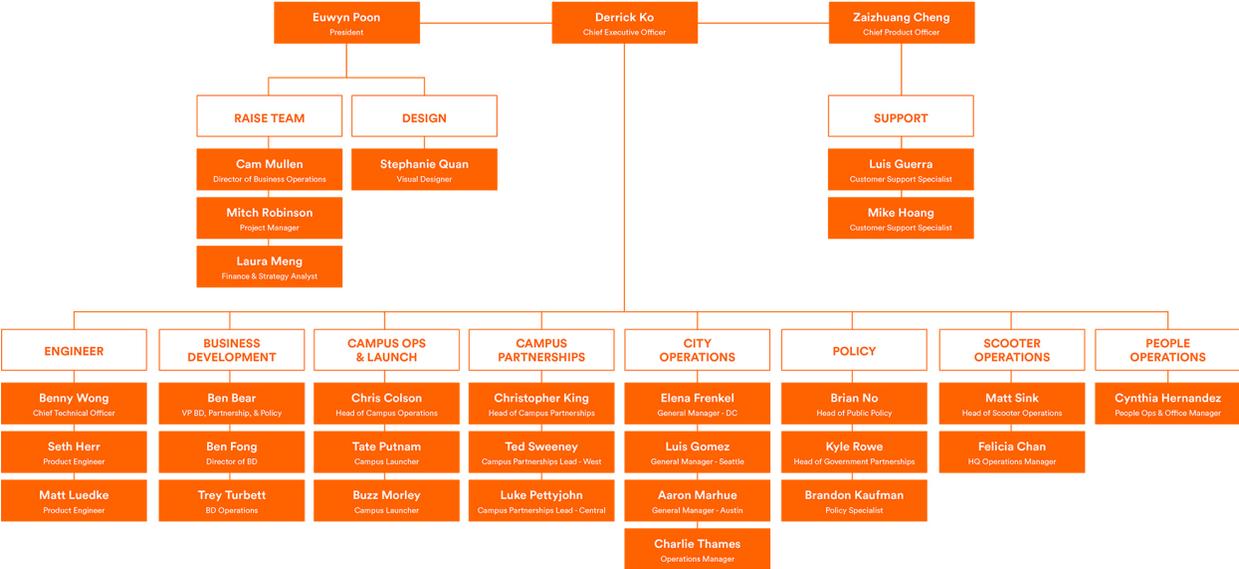
### U.S. Senate Committee on Commerce, Science, and Transportation

*Professional Staff Member* | July 2012 – May 2017

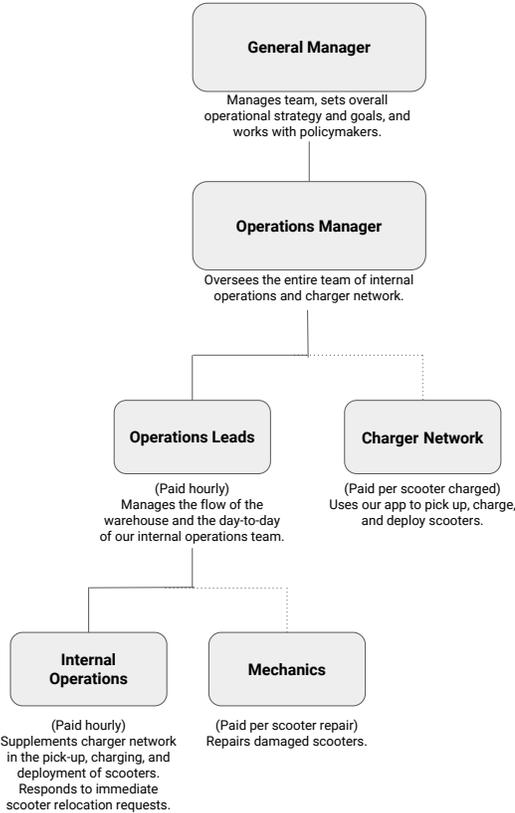
- Analyzed, proposed, and implemented Chairman or Ranking Member's legislative and oversight agenda on a range of technology and interstate commerce issues
- Engaged with private-and public-sector stakeholders, regulators, and other Member offices to reach consensus on Committee issues, advance legislation, and conduct oversight
- Drafted legislation, oversight letters, memoranda, speeches, and statements
- Monitored emerging technologies and their implications on consumers and industry
- Took lead on drafting Ranking Member Nelson's comprehensive motor-vehicle safety legislation
- Helped investigate the General Motors ignition switch and Takata airbag defects
- Helped draft and negotiate legislation on, among others, data security and breach notification, consumer online reviews, ticketbots, self-driving cars, and patent demand letters
- Helped investigate data breaches and privacy incidents; helped organize multi-stakeholder summit on technological solutions to distracted driving

# Organizational Charts

## Company



## Local Operations Team



**b. Number, type, location and duration of other shared mobility systems operated. Include all current operations, and the operating permitting requirements and history of compliance with permitting, local and state law.**

Spin has begun focusing on markets that allow scooters and shifting away from markets that allow only bikes. Currently, Spin operates shared mobility systems in over a dozen markets and does not operate in any market where we do not have formal permission:

**Seattle, WA**

Since: July 2017

Type: Bicycles, multivendor permit program

History: Spin worked closely with SDOT as the agency developed the nation's first dockless mobility regulations, and it was the first company – of three – to receive a permit from SDOT and to launch dockless bikeshare in Seattle.

**Washington, DC**

Since: September 2017

Type: Bicycles and scooters, multivendor permit program

History: Spin is one of several companies to be permitted to operate in DC, where we have been operating dockless bikes. We plan to add scooters to our fleet in the coming months. We have also been working closely with DDOT as it contemplates updated permit regulations for dockless mobility.

**Charlotte, NC**

Since: November 2017

Type: Bicycles and scooters, multivendor permit program

History: Spin was one of the original companies to receive a permit to operate in Charlotte, where we have been operating dockless bikes. In light of recent changes to the permit regulations, we plan to add scooters to our fleet.

**Durham, NC**

Since: November 2017

Type: Bicycles, multivendor permit program

History: Spin was one of three companies to receive a permit to operate in Charlotte, and we have been operating dockless bikes there since. We are working with the City in the hopes it will allow scooters as well.

**Duke University**

Since: November 2017

Type: Bicycles, multi-vendor contract

History: Spin has a contract with the University to operate on campus, which has granted Spin the ability to deploy a much larger number of bikes on campus compared to the other company that is allowed to be on University property. We are working with the University in the hopes it will allow scooters as well.

**University of California, San Diego**

Since: November 2017

Type: Bicycles and e-bikes, single-vendor contract

History: Spin was selected as the sole vendor after a competitive RFP process with five other companies.

**Towson University**

Since: December 2017

Type: Bicycles, single-vendor contract

History: Spin was granted a single-vendor contract to operate dockless bikes for the campus community after the University interviewed 10 different companies. We are working with the University in the hopes it will allow scooters as well.

**Flagstaff, AZ**

Since: April 2018

Type: Bicycles, single-vendor contract

History: Spin worked closely with the City for several months to educate stakeholders and draft a single-vendor contract for dockless bikes. Now operating dockless bikes, we are working with the City to allow scooters.

**Northern Arizona University**

Since: April 2018

Type: Bicycles, single-vendor contract

History: Spin worked with the University, in tandem with the City of Flagstaff, for several months. Spin operates dockless bikes under a single-vendor contract, and we are in talks with the University about adding scooters to the fleet.

**Lexington, KY**

Since: June 2018

Type: Bicycles and scooters, single-vendor contract

History: Spin won a competitive process after the City interviewed several companies to provide dockless mobility services. Of note, the City, based on its research of other U.S. cities that have allowed dockless mobility, chose Spin to be the sole company, instead of allowing a “free for all” type environment where multiple companies try to

out-deploy each other. We are currently working with the City to determine the timeline for adding scooters to our fleet.

**University of Kentucky**

Since: June 2018

Type: Bicycles and scooters, single-vendor contract

History: Spin won an exclusive single-vendor contract with the University to provide dockless mobility services, after a competitive process in which the University and the City of Lexington worked together to interview and grade several companies. Similar to the City, the University purposefully chose to avoid a potentially chaotic situation in which multiple companies operate. We are currently working with the University to determine the timeline for adding scooters to our fleet.

**Jefferson City, MO**

Since: July 2018

Type: Bicycles and scooters, single-vendor contract

History: Spin won a single-vendor contract for bikes and scooters with the City after a competitive RFP process.

**Coral Gables, FL**

Since: July 2018

Type: Bicycles and scooters, single-vendor contract

History: Spin was awarded an exclusive single-vendor contract by the City Commission to operate scooters in Coral Gables, becoming the first and, thus far, only company to receive permission to operate scooters in Florida. This contract came on the heels of several months of working closely with the City and after two other companies rogue-deployed scooters in the City without permission.

**Troy University**

Since: July 2018

Type: Bicycles and scooters, single-vendor contract

History: Spin was granted a single-vendor contract to operate bikes and scooters at the University, after several companies were considered and reviewed.

**Expected Operations**

- Austin: Permit received
- Denver: Permit received
- San Francisco: Permit pending

**c. Length of corporate operation, and related or ancillary business operations beyond shared mobility systems.**

Founded in November 2016.

First operations began July 2017.

**d. Names and addresses of any person or entity that has (i) more than 10 percent equity, participation, or revenue interest in the application or (ii) is a trustee, director, partner, or officer of that entity or of another entity that owns or controls the applicant. Identify the names and addresses of any parent or subsidiary of the application, and describe the nature of any such parent or subsidiary business entity. Identify any subcontractors or other partner organizations.**

**Derrick Ko**

CEO and Co-Founder  
435 China Basin St, Apt 421,  
San Francisco, CA 94158

**Euwyn Poon**

President and Co-Founder  
548 Market St, #53726  
San Francisco, CA 94107

**Zaizhuang Cheng**

CPO and Co-Founder  
435 China Basin St, Apt 421  
San Francisco, CA 94158

**Grishin Robotics Fund LP**

2735 Sand Hill Rd,  
Menlo Park, CA 94025

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# Equipment

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a. Type and specifications of all devices. The selection committee may request a device demonstration if desired to clarify or confirm device details or functionality.

### Scooter Specifications



- Maximum speed of 15 MPH
- Up to 19-mile range
- 250W motor
- Built-in GPS
- Total weight of 27 pounds
- 8.5-inch diameter wheels
- ANSI/CAN/UL 2272-certified
- Aircraft-grade aluminum frame construction
- Front-tire lock when parked
- Front, rear brakes (disc and anti-lock systems)
- Powerful white front headlight
- Rear red light that flashes when braking
- Bell
- QR code on top of handlebar

**b. Number of devices proposed at launch, and anticipated maximum during pilot**

Spin proposes a fleet of 250 scooters at launch, with monthly increases in fleet size based on the Minimum Utilization Rate (MUR) as well as parking compliance and any other operational issues.

Spin's experience operating dockless mobility programs in roughly 50 markets across the United States has shown us that starting with a modest fleet and slowly phasing in more vehicles, based on the City's wishes and as demand warrants, is the best way to responsibly begin and operate a dockless mobility service. This approach, we believe, allows the public to gradually become acquainted with our new mobility option while guarding against a backlash, which we have seen when companies practice "shock and awe" deployments.

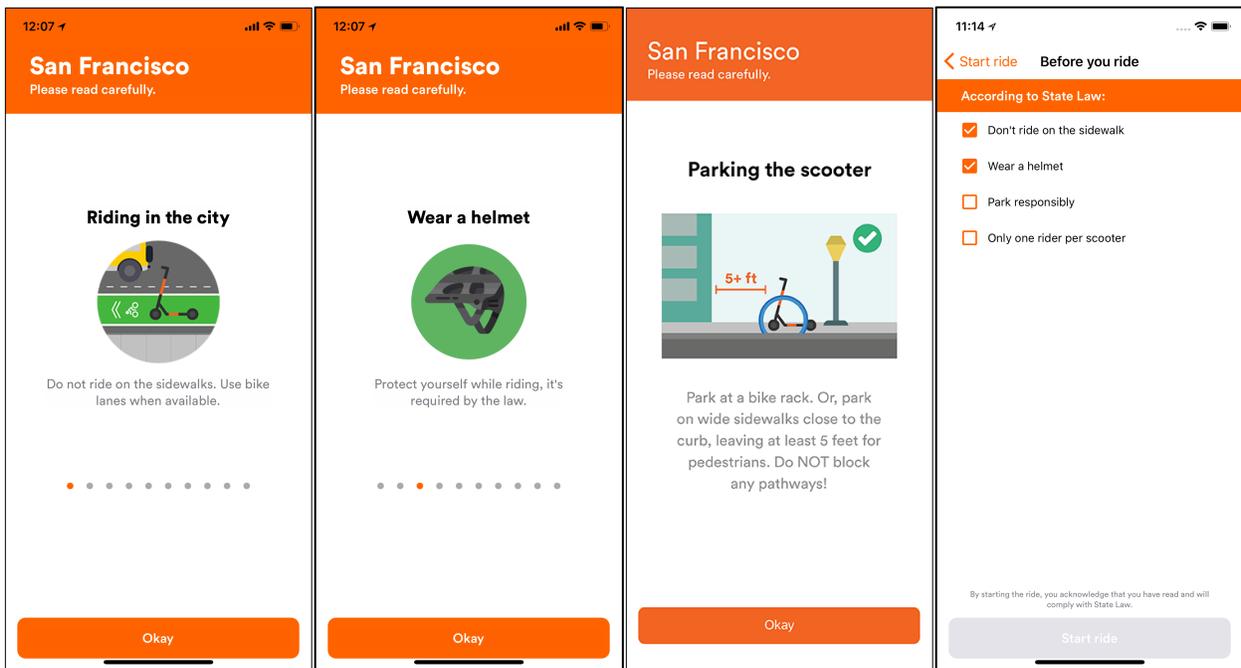
As such, we believe that a fleet of 250 scooters at launch with a plan to steadily increase to 1,000 over time will serve the needs of Santa Monica residents and visitors, while still allowing the City and Spin to collaborate on making any adjustments as needed. We would further like to work with the City to determine the appropriate service area for a given fleet size, to ensure that any such service area addresses any priority locations or suggestions.

**c. Device communications, device location systems, device capabilities, and system data collection details**

**Device Communications**

Spin’s scooters are outfitted with both wireless communications capabilities as well as on-scooter communications. Our scooters currently use Bluetooth connectivity to communicate with a user’s phone, allowing the user to unlock and rent a scooter through Spin’s mobile application as well as check the battery level. In addition to Bluetooth communications, our scooters contain built-in GPS units that communicate with our internal system to help show the locations of each scooter to the user as well as to our operations team.

Each scooter also communicates to users through decals that display important messaging on how to use the service, park responsibly, contact customer support. All other user-facing communications are done through Spin’s mobile application, such as informational pop-ups, in-app push notifications, and other instructions. See below for example images from the mobile application and on-scooter messaging.





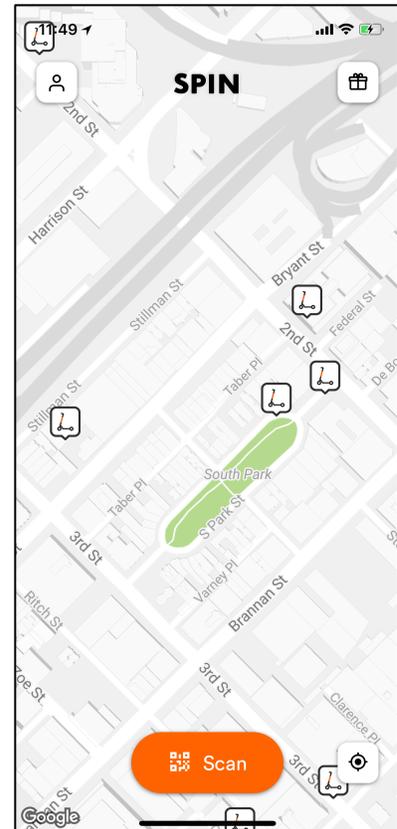
### Device Location Systems

Spin scooters contain GPS units, allowing users and our operations team to track the location of the fleet at all times. In addition to the scooter’s built-in GPS units, we also use the user’s phone, if they grant us permission, to improve location accuracy by cross-referencing both data sources. See below right for example image of a user’s mobile application interface when looking for a scooter.

### Device Capabilities

Spin’s scooters feature various capabilities to provide users with a safe but enjoyable ride. For example, each scooter has a powerful front headlight that turns on any time the scooter is being rented, regardless of the time of day, as well as a rear red light that flashes whenever it is braking. Built with high-strength aluminum, Spin scooters also have a maximum speed of 15 MPH, ensuring compliance with local laws and the safety of the public, and feature both front and rear brakes. Additionally, Spin’s scooters have the capability to be disabled remotely, allowing us to remove a scooter from service for any reports of damage or maintenance issue.

Besides the device itself, we utilize our mobile application to provide additional capabilities and to operate a better service. For example, users are asked to give a “thumbs-up” or “thumbs-down” rating each time they unlock a scooter, in



order to rate the parking job of the previous user. This allows us to crowdsource parking behavior and address consistent bad parkers, as well as work with the City to address areas that receive a disproportionate number of “thumbs-down” ratings.

### **System Data Collection Details**

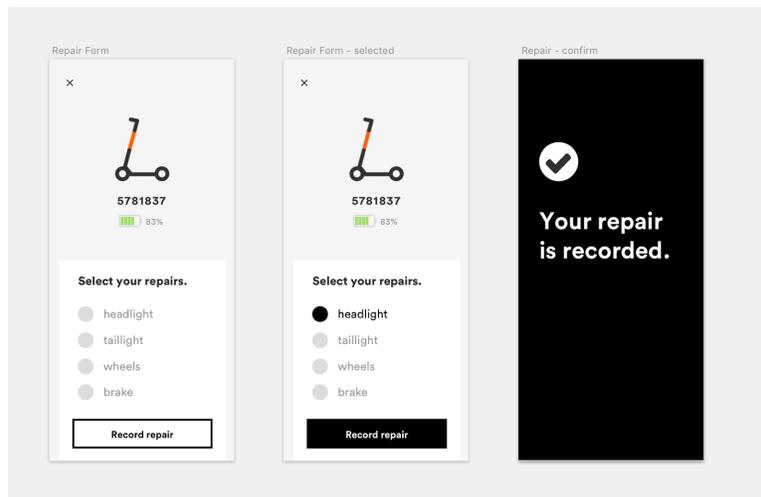
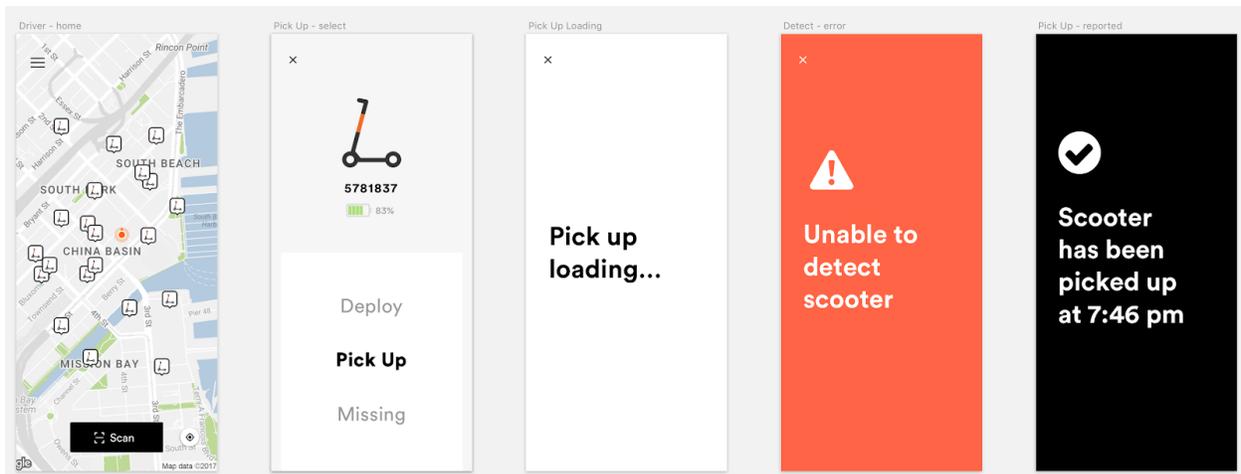
Spin collects usage data via the scooter and the mobile application in accordance with our terms of service and privacy policy in order to provide our service and to improve our operations. Spin does not sell any data to third parties, and we comply with all applicable data security rules. All data collected is stored on the Amazon Web Services platform to protect users’ privacy and is analyzed with the Mode Analytics tool. This allows us to analyze and share with the City of Santa Monica data on trip origin/destination, number of users, MUR, etc. Spin does not collect or retain payment information data of our users.

### d. Functionality and features of software and operations management systems

Spin uses an internal software system to manage and monitor our fleet and operations. This system allows Spin employees to see, in real-time, usage and the locations and status of each scooter, as well as each scooter’s history of usage and repairs. Among the system’s features are remote disabling and heatmaps.

Spin’s team also use the system to receive and record any user or public questions or complaints, reports of mis-parked scooters, and reports of scooters in need of maintenance. Each “ticket” received is assigned to a specific person on Spin’s operations team, allowing the operations team to quickly respond to any urgent issues.

For managing the charger and maintenance network, Spin has developed a separate mobile application. Below are example screen shots from this mobile application. More information on the charger network’s role at Spin can be found in Section 4.



**e. Identify ability to provide minimum of 250 devices at program launch date**

Spin will be able to provide 250 scooters at program launch date, barring unforeseen issues such as supply disruption caused by the current Administration ongoing tariff wars with major trading partners. See below for Spin's agreement for scooters.



**f. Identify local warehouse or operational centers**

Spin does not currently have a warehouse or operations center in Santa Monica at this time, as we chose not to launch prior to the City developing this program. If chosen to participate in the pilot program, Spin will notify the City of our warehouse and/or operation center(s) address(es).





# Operations



### a. Fare structure, including any low-income or special fare options

Spin is committed to providing a sustainable mobility option with a pricing structure that is affordable to as many users as possible.

To pay for a Spin scooter ride, users currently load their Spin app account's "wallet" with funds, with the cost of each ride debited from the "wallet." Should the cost of a ride exceed the remaining balance in the user's wallet, the user is simply charged for the difference. Users are also able to input promo codes for free ride credits.

Spin accepts any major credit or debit card for in-app payments. In addition, Spin's iOS app accepts Apple Pay.

Spin is currently using early system data and surveys to explore membership options for scooter users, similar to our Spin Unlimited plans for our bikeshare systems.

#### Regular Rates

- \$1 to start + \$0.15 per minute.
- The pricing is displayed in the app in real-time.
- For university and corporate partners, Spin typically provides discounted rates for their community members.

#### Low-Income Rates

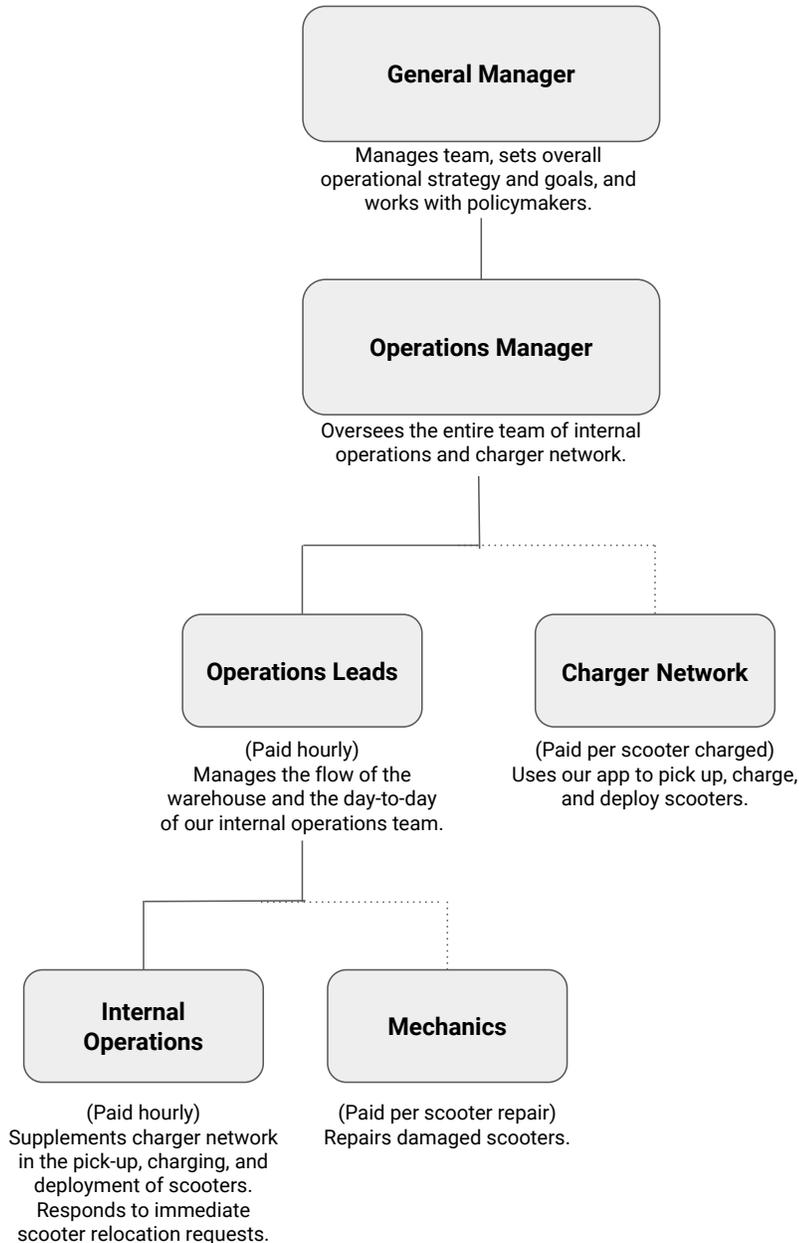
- Participants in our Spin Access program are eligible for discounted rates (50 percent off).
- \$0.50 to start +0.07 per minute.
- Spin Access also allows the unbanked (those without a debit or credit card) to purchase a Spin Access card with cash at partner locations.

**b. Hours of device availability, hours of customer service support, and hours of field support (i.e. outreach, rebalancing and maintenance)**

- Hours of device availability: between 7 AM and 8 PM daily
- Hours of customer service support: 24 hours
- Hours of field support: 6 AM to 8 PM daily

### c. Staffing plan and responsibilities for Santa Monica operations

In Santa Monica, Spin's local operations team's organizational structure will be as follows:



We currently plan for our charger network to pick up, charge, and redeploy approximately 80 percent of Spin scooters that are retrieved each night. The charger network's efforts are supplemented by our local operations team, who pick up remaining low-battery scooters and scooters in need of repair during the day. Our local operations team is also on call to respond to any relocation requests.

Maintenance of scooters are mainly conducted by mechanics, who are paid per scooter repair but receive more compensation depending on the difficulty and lengthiness of the required repair. Mechanics make their own schedule through an electronic scheduling system by signing up for “blocks” of time during which they repair as many or few scooters as they choose in our warehouse. Mechanics bring their own tools to perform their repairs.

Spin ensures our hiring practices are in compliance with any applicable laws by vetting our policies with outside counsel, including our compliance with equal opportunity, local hiring, and fair wage laws.

Second, we further ensure compliance with local laws by setting strict boundaries in our relationships with any independent contractors, including any independent contractors who are mechanics or members of our charger network. Members of our charger network and mechanics, for example, assist us at their own discretion by making their own schedules and working when they wish to.

- Both chargers and mechanics use their own tools and equipment for their respective work.
- While we provide educational materials, including guidelines and tutorials, on best practices, chargers and mechanics are able to perform their work according to their individual professional methods.

Third, Spin also ensures fair wages as part of our hiring plan. For jobs on internal operations team, we currently offer a competitive starting wage of \$22/hour. Spin’s operations leads, meanwhile, are currently offered a starting wage of \$24/hour. Spin also provides genuine opportunities for advancement in both positions: Some of our Spin’s senior operations employees (operations manager, launch manager) started their careers with Spin on the internal operations team.

Fourth, Spin believes strongly in hiring locally and ensuring equal opportunity throughout all hiring processes and working relationships. In Santa Monica, Spin will seek to partner with a recruitment/job placement organization that focuses on providing jobs to communities most in need.

Furthermore, Spin’s local hiring initiative will be part of our planned community outreach events in various low-income or diverse communities. In addition to educating and encouraging community participation, including through our Spin Access program, Spin personnel at each event will provide information and answer any questions about employment opportunities to interested job seekers.

For members of our charger network, our charger app, which must be used for the charging process, provides clear compensation information by displaying the number of scooters a charger has retrieved as well as the expected total compensation from Spin.

Additionally, as part of the on-boarding process, Spin provides new members of our charger network with information that outlines per-scooter compensation and provides notice that chargers will incur an electrical cost to charge Spin scooters. We further disclose to new members that participating in the charging process will result in increased gasoline and/or additional mileage if they choose to use their motor vehicles. However, many members of our charger network choose to retrieve scooters using their own bicycles or by walking, which would not incur additional gasoline and/or mileage costs.

For new mechanics, as part of the on-boarding process, Spin provides a list of recommended tools for repairing scooters, should they be missing some of the needed tools in their collection. We further disclose the expected cost of each recommended tool on our list.

**d. Plan for achieving citywide coverage and balancing, including the nature and frequency of rebalancing throughout the day to provide availability and avoid overconcentration of devices in the Downtown/Civic Center/Beach and Beach-adjacent areas**

Spin's local operations team will be actively managing the fleet every day and ensuring that scooters are available in all parts of Santa Monica as we increase our initial fleet size. In addition, our local operations team monitors scooter locations as part of its regular responsibilities to ensure adequate coverage based on our fleet size and to ensure there is no overconcentration. Our local operations team will also respond to any rebalancing requests from the City, should the City become aware of any overconcentration. Furthermore, our charger network and local operations team pick up scooters each night to charge them before redeploying them in predetermined locations based on our data analysis, ensuring that scooters – at a minimum – will be rebalanced daily.

Besides utilizing our local operations team in ensuring regular rebalancing and redeployment, Spin's user-rebalancing feature in our mobile application encourages users to rebalance the fleet with fare incentives, which can be used to better distribute the fleet or remove scooters from areas that are overconcentrated.

**e. Plan for resolution of on-going issues, daily complaints and emergencies. Provide details of how you will move devices that are parked incorrectly, are reported as complaints, or are out of service**

Spin's local operations team is available to quickly respond and address any issues that may arise, particularly relocation requests, maintenance issues, etc., whether they are reported by a user, member of the public, or the City. Our local operations team is also tasked with creative ways to address any unforeseen issues: In Seattle, for example, Spin's local operations team quickly partnered with a local diving club to retrieve a few bikes that ended up in Lake Union.

When Spin's customer support team receives a report, such as an improperly parked scooter or a scooter in need of maintenance, they immediately create a ticket that notifies and assigns the task to the local operations team. The local operations team is responsible for ensuring that we meet the required response time. If the report indicates that the scooter is in need of maintenance, Spin's customer support team remotely disables the scooter, preventing anyone else from being able to ride it until it has been picked up and repaired.

In the case of severe or inclement weather or an urgent/emergency issue, Spin is able to remotely disable the entire fleet of scooters, and we hope to work closely with the City on when to implement these measures.

#### f. Plan for regular device maintenance

Spin's local operations team is tasked with ensuring the safety, accessibility, and responsible deployment of Spin's scooters. Our local operations team will be based out of our local warehouses, from where they perform two primary functions:

##### **Maintenance**

- Ensure every scooter is inspected before deployment for, at a minimum, cleanliness, damage, and safe and reliable operation.
- Ensure repairs and training are done by professional, experienced mechanics or staff, with a recorded history of inspections and repairs.
- Make repairs – or assist mechanics with repairs – and perform on-the-spot tune-ups.

##### **Fleet Management**

- Ensure scooters are deployed in accordance with local rules, such as rules for parking in the public right of way.
- Visually survey streets and sidewalks and reposition any obstructing scooter.
- Respond to and retrieve scooters that have been marked for repair, relocation, or cleaning.
- Rebalance/redistribute scooters based on usage data and based on any City request or requirements.
- Assist with the charging process.

Any scooter is redeployed only after passing an inspection check. For our operations team and chargers, inspection criteria are as follows:

- Functioning front and rear light
- Sturdy stem and handlebars
- Functioning kickstand
- Brakes are functioning, able to seize up the wheel on flat ground (“skid”)
- Scooter is unlocking/locking properly
- Wires are intact
- Tires are properly inflated, with no punctures or abnormal wear
- Stickers and vinyls are attached properly

Spin scooters have a lifespan that is dependent on battery and the number of charge cycles. After 750 charging cycles, the battery will need to be replaced. If a scooter's frame remains in good condition, parts can be replaced indefinitely.

**g. Define how customers can communicate issues, how you will respond and the timeframe for response. Define how customer communications will be tracked and reported.**

Spin takes pride in providing the best customer support in the industry. Users can easily contact our customer support team for any reason through the mobile application, email, phone, social media, or via our website. Spin's customer support team will respond as soon as possible, typically within 10 to 20 minutes during business hours.

Spin keeps track of all user inquiries that we receive in order to gauge and improve our operational standards. Below is an example of how we report this data to a City that asks us for customer complaint information. Should Santa Monica have different requirements for sharing customer inquiry data, we would be happy to work with the City to meet those needs.

Complaints	Complaint Resolution	Total complaints	11 complaints
		Total complaints resolved	11 complaints
Complaints	Complaint Type	Bikes blocking sidewalk	0 complaints
		Bikes on private property	7 complaints
		Bike is vandalized	1 complaints
		Bike is inoperable	3 complaints
		Other	0 complaints

**h. Details of customer service system to be provided, including staffing, wait time or availability, languages, and medium (text, phone, twitter, etc.)**

Spin's customer support team is comprised of full-time in-house employees who are assigned AM or PM shifts every day. This team currently has two full-time employees, with plans to hire additional personnel based on the volume of customer inquiries.

As mentioned above, Spin's customer support typically responds within 10-20 minutes, unless it is a unique issue that requires research prior to responding. For any urgent issues, such as from the City, we endeavor to respond immediately or as soon as possible. Spin's customer support is available 24/7, is available in English and Spanish, and can be reached by our mobile application, phone, email, social media (Twitter, Facebook, and Instagram), or through our website.

## i. Availability to offer service to customers without a credit card or smart phone

### Spin Access

Spin is proud to offer Spin Access, which offers discounted rates to eligible low-income residents.

To qualify for the Spin Access low-income rates, you must be a local resident, have a state-issued identification card and either 1) receive CalFresh through the California Department of Social Services, 2) have a LA Metro LIFE Pass, or 3) utilize the Pacific Gas and Electric (PG&E) California Alternate Rates for Energy (CARE) Program. Additional income verification may be required. Individuals wishing to sign up for our Spin Access low-income program can simply fill out the online application form (see example from San Francisco below), register in-person at a community events, or work directly with one of our community liaisons.

<h3>Spin Access - San Francisco</h3> <p>The Spin Access Program allows qualifying San Francisco residents to utilize Spin's personal mobility services for discounted rides.</p> <p>Please fill out the below information so that we may determine your eligibility for this program (documentation is required). Once eligibility is verified, a Spin representative will contact you with next steps. If you have additional questions about the program or need help filling out the information below, please contact us at (888) 262-5189 or by email at <a href="mailto:hello@spin.pm">hello@spin.pm</a>.</p> <p>Note: Terms of agreement are subject to change as is associated fee structure.</p> <p><span style="color: red;">* Required</span></p>  <p><b>Email Address *</b></p> <p>Your answer <input type="text"/></p> <p><b>First Name</b></p> <p>Your answer <input type="text"/></p>	<p><b>Last Name</b></p> <p>Your answer <input type="text"/></p> <p><b>Zip Code *</b></p> <p>Your answer <input type="text"/></p> <p><b>Phone Number</b></p> <p>Your answer <input type="text"/></p> <p><b>Annual Household Income *</b></p> <p><input type="radio"/> \$10,000 or less</p> <p><input type="radio"/> \$10,001 - \$15,000</p> <p><input type="radio"/> \$15,001 - \$20,000</p> <p><input type="radio"/> \$20,001 - \$24,120</p> <p><b>Income Verification *</b></p> <p><small>Income verification may be shown through CalFresh, MTA LifeLine, and/or PG&amp;E Care Program participation. Additional income and/or eligibility documentation may be required. If you wish to participate in this program, but do not have the required documentation, please contact us at (888) 262-5189 or at <a href="mailto:hello@spin.pm">hello@spin.pm</a> to speak with one of our community liaisons.</small></p> <p><a href="#">ADD FILE</a></p> <p><input type="button" value="SUBMIT"/></p> <p><small>Never submit passwords through Google Forms.</small></p>
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Spin Access also provides eligible low-income residents who are unbanked with access to our scooters at the same discounted rate. Eligible low-income residents can use cash to purchase

a Spin Access card at partner locations<sup>1</sup>. Each Spin Access card will have a unique promo code that the user can enter into the app to “deposit” the Spin Access card’s balance into their account.

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<sup>1</sup> Spin is currently securing partner locations in the City, but possible partner locations include community organizations. We would also like to explore the possibility of selling Spin Access cards at certain City offices, similar to what we already do in other markets.

**j. Capacity to meet insurance and indemnification requirements**

Spin can meet the insurance requirements for the Pilot Program, as defined in the Request for Applications. See below for a sample COI and indemnification language from other cities where we operate.





Return Address:

City of Seattle  
Seattle Department of Transportation  
Attn: Street Use  
700 5<sup>th</sup> Ave., Suite #3900  
P. O. Box 34996  
Seattle, WA 98124-4996

<p><b>Document Title:</b></p> <p><b>PUBLIC PLACE INDEMNITY AGREEMENT</b></p> <p>Reference Number(s) of Documents assigned or released: (on page _____ of document(s))</p> <p><b>Grantor</b></p> <p><b>(Entity Applying for Permit)</b></p> <p><b>Grantee</b></p> <p><b>City of Seattle</b></p>
--

**CITY OF SEATTLE  
DOCKLESS BIKE SHARE  
STREET USE AND OCCUPATION PERMIT  
INDEMNITY AGREEMENT**

This Indemnity Agreement (“Agreement”) is made and granted by **INSERT GRANTOR**, and its successors, heirs, and assigns (collectively the “Grantor”) in favor of the City of Seattle (“City”).

**RECITALS**

The Grantor has applied to the City for permission to use or occupy public right-of-way for the Grantor’s benefit.

The City’s permission for allowing the use or occupancy is conditioned on the Grantor and its successors, heirs, and assigns complying with all permit requirements; and all applicable federal, state, and City law, including but not limited to, Seattle Municipal Code Section 15.04.060 that requires this Agreement.

## AGREEMENT

In consideration for the City's permission to use or occupy the public right-of-way that permits **INSERT PROJECT DESCRIPTION** according to the submitted Street Use and Occupancy Permit application and approved plan **INSERT STREET USE PERMIT NUMBER** the Grantor agrees as follows:

1. The Grantor, and its successors, heirs, and assigns shall forever defend, indemnify, and hold harmless the City of Seattle, its officials, officers, employees, and agents; from all liabilities, claims, causes of action, judgments, or expenses, including reasonable attorney fees and necessary litigation expenses; resulting from any actual or alleged bodily injury including death, or actual or alleged damage to property; arising out of or in connection with the using or occupying the public right-of-way.

2. The Grantor's, successors', heirs', and assigns' indemnification obligations under this Agreement do not apply to any liabilities, claims, causes of action, judgments, or expenses resulting from bodily injury or property damage caused by the sole negligence of the City, its officers, employees, elected officials, agents, or subcontractors.

3. The Grantor, successors, heirs, and assigns acknowledge that permission to use or occupy the public right-of-way is of a temporary nature and vests no permanent rights in the Grantor or the Grantor's successors, heirs, or assigns to use or occupy the public right-of-way. Upon 30-days' notice mailed to the Grantor by first-class mail or published in the City's official newspaper, the City may revoke the permission to use or occupy the public right-of-way. If the use or occupation becomes dangerous, or if the use or occupation is not being maintained or used according to Title 15 of the Seattle Municipal Code, the City may revoke permission to use the public right-of-way without providing the 30-day notice.

4. The Grantor, on behalf of the Grantor and Grantor's successors, heirs, and assigns, specifically and expressly agrees to waive Grantor's and Grantor's successors', heirs', and assigns' immunity under industrial insurance, Title 51 of the Revised Code of Washington, to the extent necessary to provide the City with a full and complete indemnity from claims for which the City is entitled to indemnity under this Indemnity Agreement. Grantor, on behalf of Grantor and Grantor's successors, heirs, and assigns, specifically and expressly agrees this provision was mutually negotiated by the parties.

5. The Grantor and its successors, heirs, and assigns acknowledge that if the City revokes the permission to use or occupy the public right-of-way; the Grantor and its successors, heirs, and assigns shall at its sole expense, remove the use or occupancy and restore the public place to at least as good a condition as required by current applicable standards.

6. The Grantor makes this Agreement on behalf of the Grantor and Grantor's heirs, successors, and assigns for the benefit of the City and its successors and assigns.





5

# **Parking, Helmets & Roadway Safety Compliance**

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**a. Describe your plan and approach to parking devices in a manner that is safe, legal, and complies with local and state law. Include both charger deployment and customer use. Describe the technology and equipment you will utilize to manage parking. Describe geofencing and virtual station capabilities, and willingness to comply with required parking hubs for chargers and customers.**

### **Charger Deployment**

Spin's local operations team and our charger network retrieve our scooters each evening to recharge them for redeployment the following morning. When redeploying scooters each morning, our charger network uses the charger app (described in Section 3) to see how many scooters should be redeployed at which location. Every member of the charger network, in addition to our local operations team, is educated on the parking rules of the City to ensure compliance.

Locations for redeployment are pre-selected, primarily based on our analysis of usage and demand. Using historical data, we observe trends to predict where trips are most likely to occur, and we closely monitor the data over time to identify new or different locations where scooters can be redeployed to meet expected demand. Being data-driven in this regard allows Spin the ability to be nimble and flexible to ensure that users seeking a mobility option can be served.

Unsurprisingly, our data-driving determination of redeployment locations is aimed at maximizing the number of rides per scooter per day. As such, our methodology for determining redeployment locations tends to give preference to those locations where trip origins are highest. Such locations tend to be at or near transit centers, and, in an effort to serve commuters during the evening rush, we frequently added an evening shift to deploy additional scooters at those locations during the time we operated our small fleet.

Besides using data analysis for redeployment locations, Spin has traditionally deployed our vehicles on a regular or daily basis at priority areas, as determined by either a City (i.e. underserved neighborhoods, low-income zip codes) or a partnership with a local stakeholder (i.e. a transit agency, NGO partner, Spin for Business partner).

Should we receive a report of improperly deployed scooters, our internal policies hold the responsible charger or employee accountable and ensure improper deployments are quickly rectified. Regardless of the source, all reports of improperly parked scooters (as well as potential safety and maintenance issues) are handled by our in-house customer support team, who creates tickets and assigns them to a Spin employee for attention. Spin personnel will

respond to such tickets within the specified timeframe upon receiving notice. For any urgent requests – such as from the City – we respond as soon as possible.

## **Customer Use**

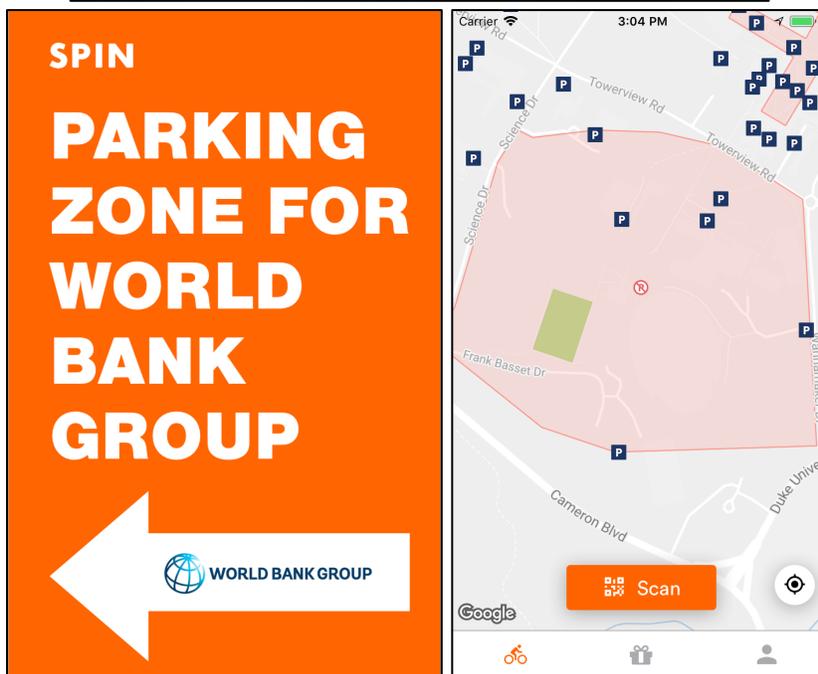
Besides various methods of user education, which we describe in detail later in this Section, Spin has been actively exploring and implementing various measures to increase compliance with parking and riding rules that are technologically feasible and reliable.

### ***Geofencing:***

We currently plan to geofence our service area to maintain scooter density, which provides users with a more reliable and dependable service, the ability to operate more efficiently, and to ensure that scooters do not go to jurisdictions that do not allow scooters. The service area is shown to users in the in-app map, and our user education – such as informational pop-ups – informs users to remain in the indicated service area. Should a user ride a scooter outside the geofenced area, we currently use in-app push notifications to remind the user to finish the trip and park the scooter within the service area. Should a user finish and park a scooter outside the geofenced area, we currently send an automated email asking the user to bring the scooter back to the service area. Besides the aforementioned notifications, potential methods to increase user compliance include a penalty fee for users who park a scooter outside the geofenced area.

### ***Parking Signs and Zones/Virtual Stations:***

Some of our partner cities and campuses have asked us to design parking signs or parking zones to implement in certain, high-traffic locations to encourage corralling of Spin scooters. Should the City be interested, Spin would be happy to help design and implement similar parking signs and zones, which are akin to virtual stations, as long as it is technologically feasible. These parking zones/virtual stations are displayed in the user's in-app map, encouraging users to park at the locations. See below for examples of Spin's parking signs, parking zones, and virtual stations.



***Sidewalk Concerns:***

In terms of technologies that mitigate sidewalk usage, we have found that current technologies do not yet allow for a feature to reliably detect when a scooter is being ridden on a sidewalk: Standard commercial-grade GPS units are not accurate enough. From a user perspective, implementing a GPS-based sidewalk detection solution today would result in a poor, frustrating experience, with false positives frequently rendering

the scooter unusable even for proper usage. Instead, we are working on another sidewalk-detection technology that utilizes accelerometer patterns to gauge whether the scooter is being ridden on a sidewalk versus the road. Spin also remains committed to continue exploring any and all options and working closely with the City on ideas.

In terms of technologies to enforce parking compliance, we question the efficacy of some previously suggested measures. For example, some have suggested that operators adopt a feature that can detect when a scooter has fallen over. We believe that such a feature does not actually address the problem it is claiming to address: 1) Scooters have a low center of gravity and are already much less prone to tipping over than, say, bicycles. We believe most scooters that fall over are caused by human action and rare weather events. 2) Whether an operator is notified that a scooter has fallen via the “tip-over” technology or a member of the public, all operators are required to respond within the City’s desired timeframe. 3) It is our belief that the main concern is not with the occasional tipped-over scooter but with scooters that are obstructing sidewalks and pedestrian access.

### ***Lock-To Mechanism:***

Spin has developed a technological solution that directly addresses parking compliance – a lock-to mechanism that requires users to lock a scooter to a physical object when parked. Our prototype leverages an integrated Bluetooth cable lock to secure the scooter to a bike rack, street post, or another physical object in the furnishing zone and, thus, out of the pedestrian pathway. The lock-to solution, in combination with Spin’s broader geofence capabilities, presents an immediately available ability to comply with any required parking hubs for chargers and customers.

Our decision to develop the lock-to prototype was in direct response to feedback from our partner cities and campuses, including San Francisco’s Department of Public Works and the San Francisco Bicycle Coalition, both whom informed us that a similar lock-to mechanism used for dockless e-bikes in the City has been considered successful in abating sidewalk obstruction. In addition to directly addressing the problem of improperly parked scooters, we believe our lock-to prototype will also address issues of vandalism and theft, helping to ensure a sustainable business model on which the community can depend.

From the user’s perspective, using a Spin scooter with a lock-to mechanism is relatively straightforward:

- 1) User scans a scooter’s QR code to start a trip, which unlocks the scooter’s wheel and unlocks the integrated lock-to mechanism.

- 2) User releases the unlocked cable from the physical object to which the scooter was secured in order to start riding.
- 3) To finish riding, the user ends the trip in the Spin app to lock the scooter's wheel and then locks the scooter's lock-to cable to a physical object to complete the process.

Considerations:

While a lock-to mechanism is currently the only solution that most directly addresses and mitigates improper parking, lock-to mechanisms on all Spin scooters would create additional layers of user inconvenience that we estimate would result in lower consumer acceptance and ridership in the presence of other operators' scooters without lock-to mechanisms: In addition to the extra steps and time required to disengage, release, and re-secure the lock-to mechanism for each scooter trip, scooters with lock-to mechanisms would be located in less "convenient" and more distant locations for many consumers, as the location of our lock-to scooters would be limited to those furnishing zones with enough physical objects.

Producing and installing lock-to mechanisms fleet-wide would also take an estimated three months, delaying our ability to begin operations, should we be selected to operate in Santa Monica, and conceding our ability to compete against other permitted operators for the duration.

Based on our analysis of the aforementioned considerations of implementing our lock-to mechanism fleet-wide, we believe that we would need to be permitted roughly three-fourths (3/4) of the initial overall fleet cap to allow us to operate in an economically viable way and to compete as a late entrant.

A mixed fleet of scooters – with and without lock-to mechanisms – would allow the opportunity for Spin and the City to test and better evaluate the efficacy of the lock-to mechanism, including the ability to test different



prototypes. However, we believe that operating a mixed fleet would create not only the same layers of user inconvenience as mentioned above but also consumer confusion resulting from having to use Spin scooters in two different ways. Furthermore, a mixed fleet would still require us to produce and install lock-to mechanisms on a portion of our fleet, delaying the deployment of scooters with lock-to mechanisms for about an estimated two-to-three months.

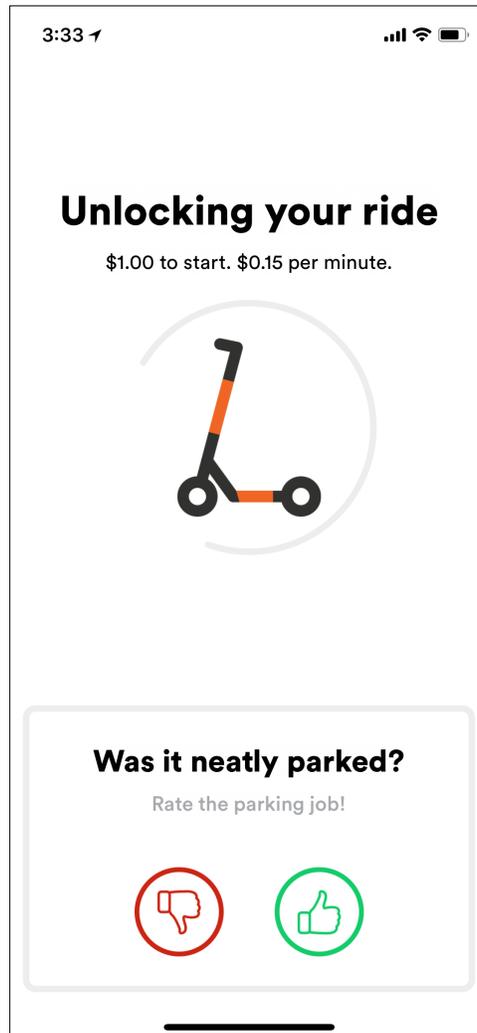
Should the City be interested in allowing Spin to test out a mixed fleet, our analysis indicates that we would need to be permitted roughly two-thirds (2/3) of the initial overall fleet cap to allow us to operate in an economically viable way and to compete as a late entrant (assuming the mixed fleet would be split 50-50 between scooters with and without lock-to mechanisms).

**b. Describe strategies to influence customer riding and parking behavior; be specific about what will be offered and at what time. Describe how you will engage with users who repeatedly violate rules or otherwise misuse the system.**

Spin uses several methods to influence user compliance with the City's rules for scooter riding and parking, besides our education efforts.

### Parking Rating Tool

When riders unlock a scooter for a ride, they are asked by the app to rate the parking job of the previous rider. In addition to creating social awareness around the need to park properly, we keep track of negative ratings, associating them user accounts. For habitually bad parkers, we employ warnings and even restrictions.



### User-Submitted Pictures

Spin offers a technological feature in our app that requires users to take and submit a picture of their parked scooter when they end their ride. By implementing this feature, our aim is to test whether requiring picture submissions will actually result in increased user compliance. We also plan to monitor the submitted pictures as part of any action we take for noncompliant users.

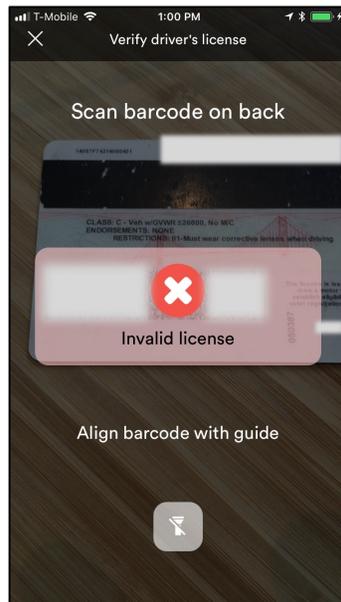
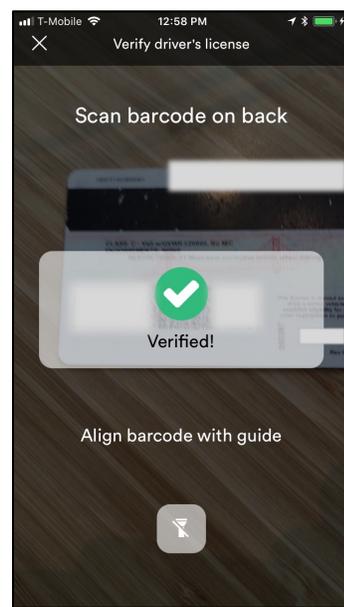
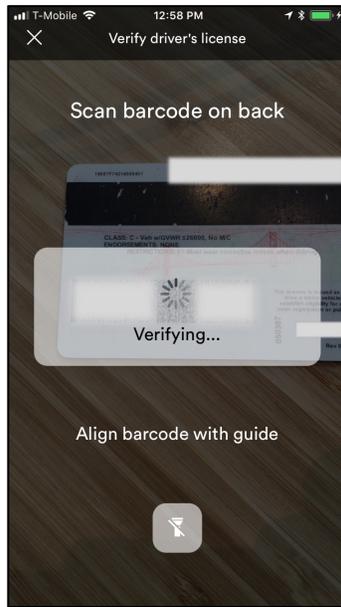
### Noncompliant Users

Spin utilizes our methods of monitoring compliance – including negative ratings on the Parking Rating Tool and reports received by our customer support team – to flag users who have been reasonably linked to noncompliant actions. For users who are flagged to be repeatedly noncompliant with scooter use, we take appropriate and escalating action, including fines, temporary suspensions, and permanent bans. For example, a user who has been linked to a negative rating on the Parking Rating Tool five times within a seven-day time frame will likely be suspended from the Spin for one week.



**c. Strategy for avoiding underage use of e-scooters, or use without a driver's license**

Spin's mobile application requires all new users to scan a driver's license before they are allowed to unlock and ride a scooter. The scanning feature verifies that the driver's license is valid, and the mobile application rejects any user who attempts to scan an invalid driver's license.



**d. Plan for making helmets available to customers of e-scooters and e-bikes**

As part of our marketing and launch plans, Spin regularly hosts helmet giveaways in new markets. Additionally, Spin plans to host regular community events with free helmet giveaways for attendees in Santa Monica.

**e. Plan for making customers aware of e-scooter and e-bike helmet laws and providing resources for compliance**

Please see Section 5(f) below.

**f. Plan for educating users about rules of the road, including illegal sidewalk riding**

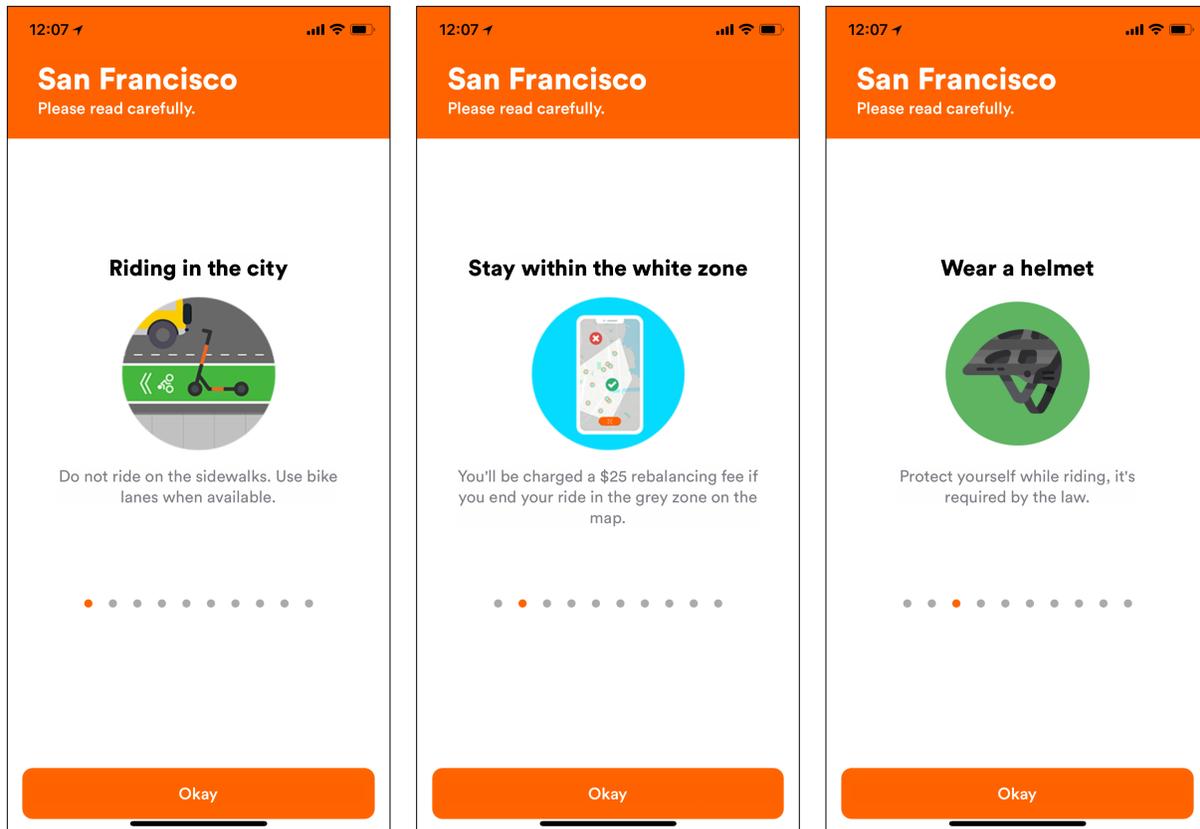
Spin has implemented various measures to actively encourage user compliance with laws.

**Informational Pop-Ups**

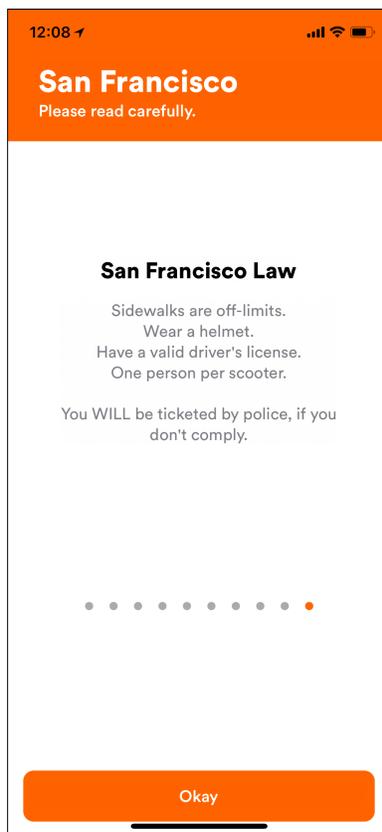
All new users are shown informational pop-ups in Spin’s app that must be affirmatively dismissed in order to proceed. The pop-ups are shown based on the geographic location where the app is opened and are customized to the City’s specific rules and needs. Spin is happy to further tailor the content of the informational pop-ups at the City’s request. For instance, the City may request that certain informational pop-ups be displayed each and every time someone uses the app.

Spin currently displays about 10 informational pop-ups, which provide instructions on using a scooter and educates users about the relevant rules for riding and parking.

We also currently display the last informational pop-up, which lists state and local laws, each time a user utilizes the app to underscore their importance. San Francisco’s laws are shown as an example.

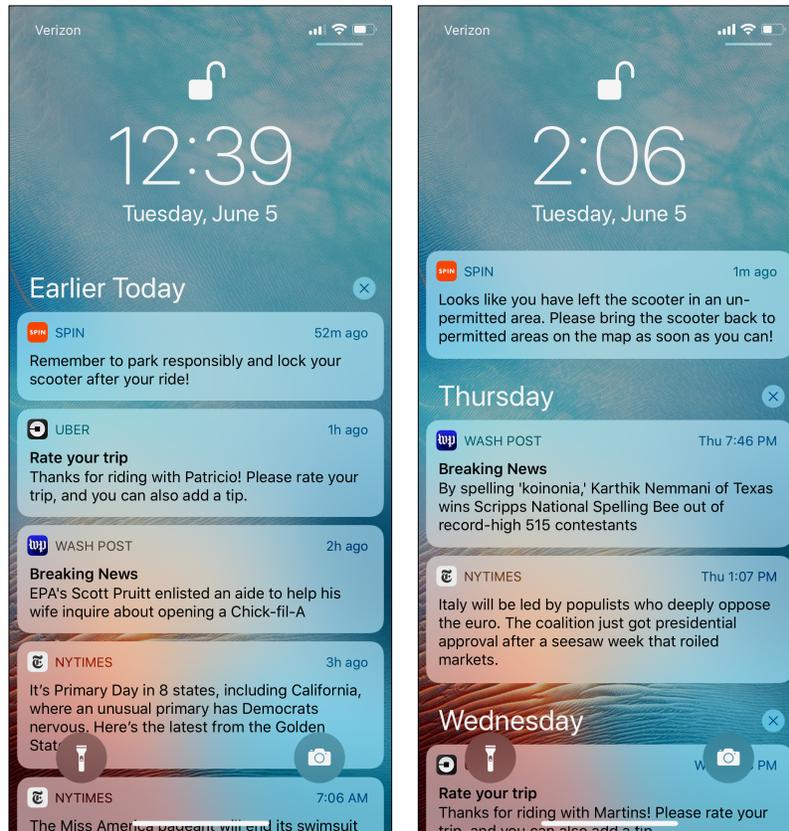






### In-App Push Notifications

Spin uses in-app push notifications – which can also be customized by geographic area – to send users various messages and reminders: riding and parking rules, when they may be outside a permitted area (if applicable), reminder to lock the scooter after their trip, etc. Similar to the informational pop-ups, we would be happy to further tailor the content of in-app push notifications at the City’s request. We currently employ in-app push notifications to remind users to lock and park the scooter correctly at the end of their trip and, if applicable, to warn users who may have taken a scooter into a restricted area.



## Emails

Spin regularly sends emails or conducts email campaigns to users, which serve as additional methods of reminding users about riding and parking rules. New users, for example, may receive “welcome” emails that incorporate a reminder of the relevant rules. Existing users, meanwhile, may receive periodic or targeted email reminders of the local rules, based on user compliance and at the City’s request. In addition, we send emails to help enforce certain rules, such as, if applicable, when a user appears to have taken a scooter into a restricted area.

From: Spin Scooter & Bike Share <hello@spin.pm>  
Date: [REDACTED]  
To: [REDACTED]  
Subject: Your Safety Matters  
Reply-To: [REDACTED]

SPIN



## Your Safety Matters

We'd like to take a moment and make sure everyone is riding safely while having fun. A few things to keep in mind:

### Ride

Use bike lanes whenever possible. Share the road and remember that not everyone rides the same way.

### Safety

Helmets are for your protection. Make sure you wear one.

### Be Mindful

Park on wide sidewalks in the furniture zone closer to the curb or near bike racks out of the way of pedestrian traffic. Avoid blocking sidewalks, wheelchair ramps, bus stops, and landscaped areas.

[Learn More About Safety](#)

From: Spin <hello@spin.pm>  
Date: [REDACTED]  
Subject: Looks like you parked outside the zone - bring it back!  
To: [REDACTED]

SPIN

Hey there,

It looks like you have left the scooter #8832578 in an un-permitted area.

We charge a **\$25** recollection fee to bring it back in the zone. But we'll let it slide this time. :)

Please bring the scooter back to permitted areas on the map as soon as you can!

Thanks,

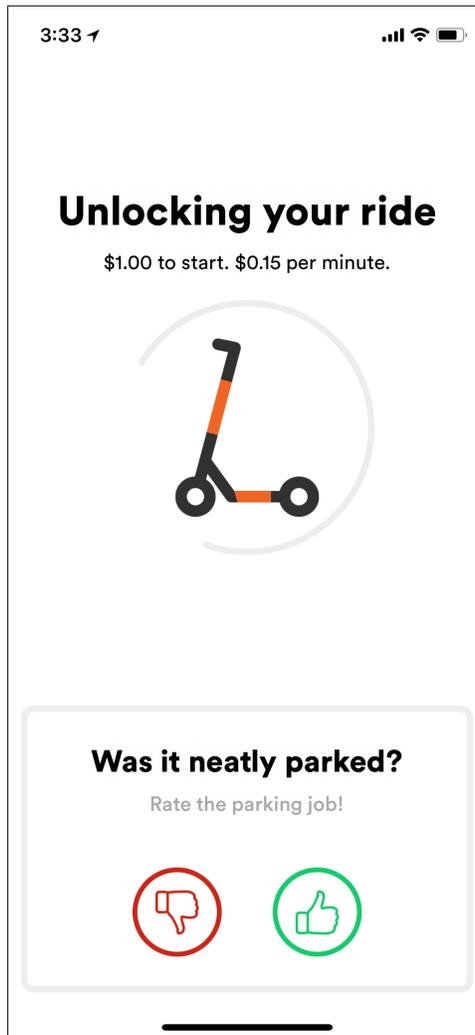
The Spin Team



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188 King Street, Unit 203, San Francisco, CA 94107  
[Terms of Use](#) | [Privacy Policy](#) | [Unsubscribe](#)

## Parking Rating Tool

As previously described, the Parking Rating Tool creates social awareness around the need to park properly, in addition to being used to monitor user compliance.



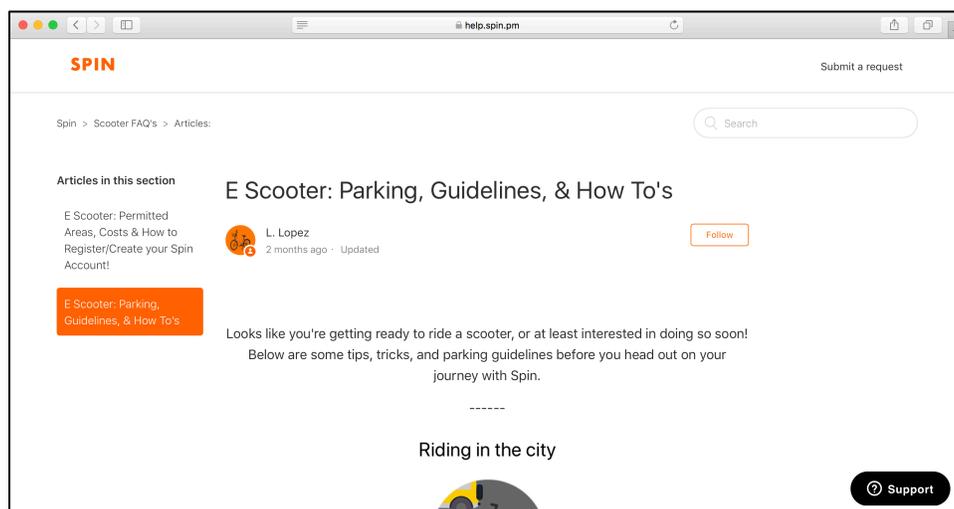
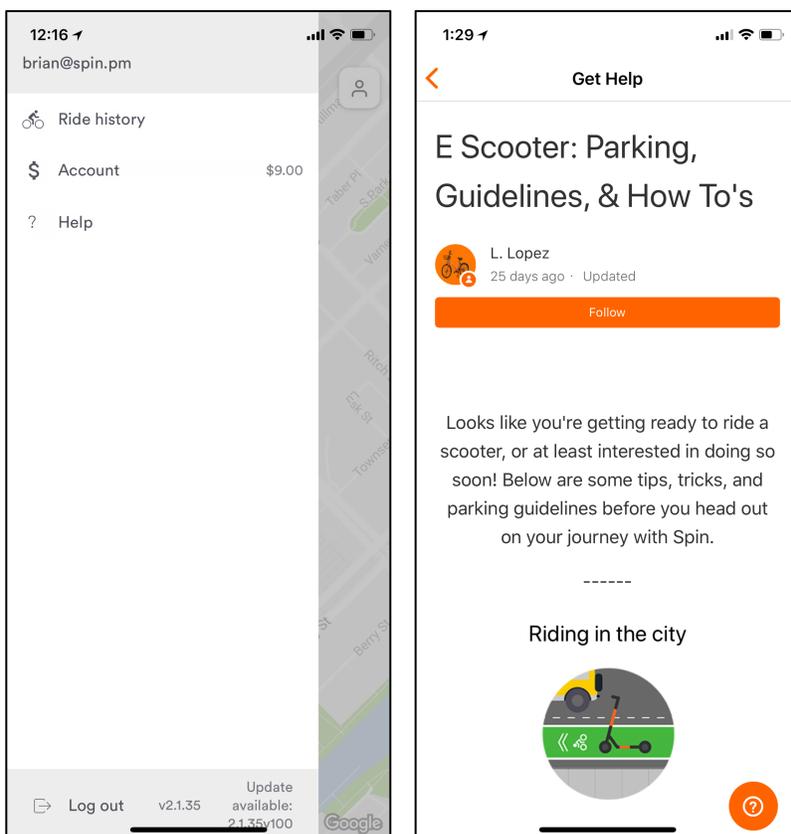
## On-Scooter Education

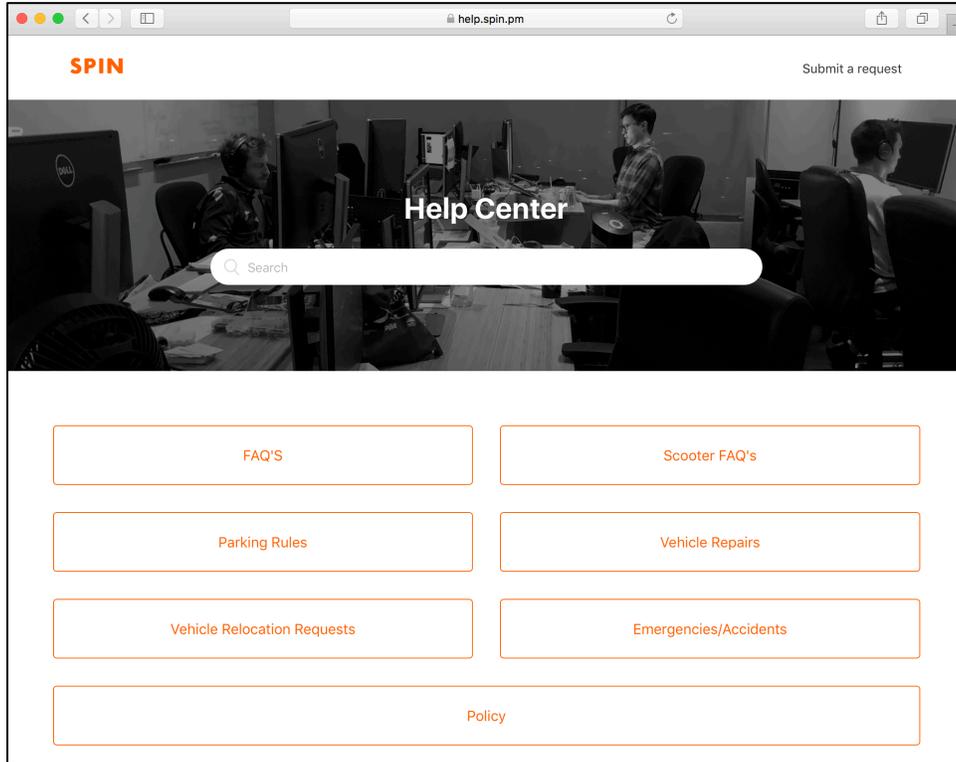
Spin also educates users about the City's rules for parking and riding by affixing clear and conspicuous language on the scooters themselves.



## Online Education

Information on how to ride and park scooters properly are on our Help Center, which is easily accessible both in the app and online. These instructional and educational articles, as well as answers to frequently asked questions, are found by pressing the “Help” icon in the app and the “Support” icon on our website.

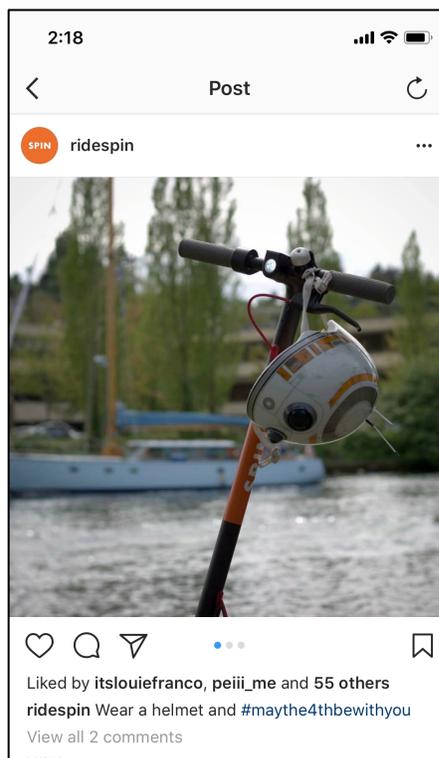
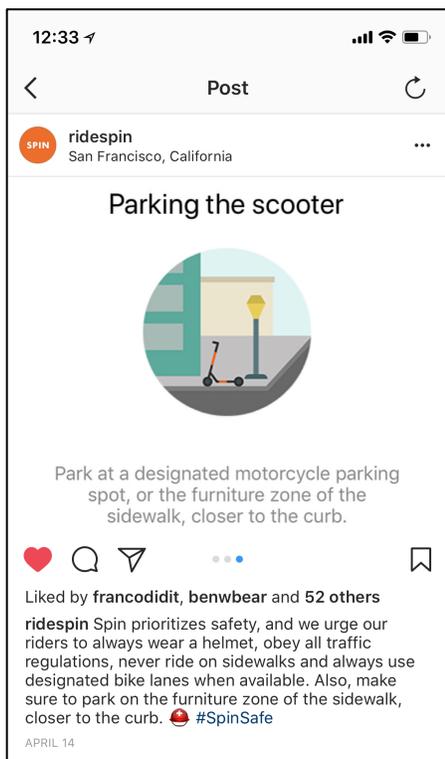




Furthermore, Spin has a dedicated Safety Guide webpage that is prominently linked at the top of our website.



Spin also raises awareness about the proper riding and parking rules for scooters via our social media accounts, including Twitter, Instagram, and Facebook.



We also are in the process of creating videos materials that educate the public on the proper ways to ride and park a Spin scooter, and we plan to disseminate the video materials via email, website, and social media. View an example here: <https://youtu.be/zCzzbPF4Y8I>.

### On-the-Ground Education

We also educate users and the general public about proper riding and parking by having an on-the-street presence in various ways. First, Spin regularly participates in local events that promote safe riding and protected bikes lanes, including sponsoring some of the events. We often take advantage of these types of public events to also give away free helmets to users.



Second, we have promoters assigned to high-traffic areas, where they are tasked with informing interested members of the public about riding Spin safely and responsibly.

Third, we have previously distributed and posted flyers in other markets that inform users and the public about safe and responsible riding and parking.

SCOOTER 101

**RIDE IN BIKE LANES  
OR ON THE STREETS  
RIDE LIKE A PRO.**



SPIN  
Download to ride at [www.spin.pm](http://www.spin.pm)

#ridespin

04.19.18

SCOOTER 101

**YOLO,  
SO WEAR  
A HELMET.**



SPIN  
Download to ride at [www.spin.pm](http://www.spin.pm)

#ridespin

04.19.18

SCOOTER 101

**DRIVERS LICENSE  
REQUIRED (NO FAKE  
IDS, MCLOVIN).**



SPIN  
Download to ride at [www.spin.pm](http://www.spin.pm)

#ridespin

04.19.18

SCOOTER 101

**DON'T BLOCK  
PEDESTRIAN WALKWAYS.  
THIS ISN'T HOPSCOTCH.**



SPIN  
Download to ride at [www.spin.pm](http://www.spin.pm)

#ridespin

04.19.18

SCOOTER 101

**BE THOUGHTFUL-  
DON'T BLOCK  
HANDICAP RAMPS.**



SPIN  
Download to ride at [www.spin.pm](http://www.spin.pm)

#ridespin

04.19.18

SCOOTER 101

**DON'T PARK ON  
PRIVATE PROPERTY, LIKE  
SOMEONE'S DRIVEWAY.  
THEY'LL APPRECIATE IT.**



SPIN  
Download to ride at [www.spin.pm](http://www.spin.pm)

#ridespin

04.19.18

SCOOTER 101

**PARK IN THE FURNITURE  
ZONE (THE AREA ON THE  
SIDEWALK WITH BIKE  
RACKS). HOW'D IT GET  
THAT NAME ANYWAYS?**



SPIN  
Download to ride at [www.spin.pm](http://www.spin.pm)

#ridespin

04.19.18

SCOOTER 101

**DON'T PARK IN THE  
MIDDLE OF SIDEWALKS.  
AIN'T NOBODY GOT  
TIME FOR THAT.**



SPIN  
Download to ride at [www.spin.pm](http://www.spin.pm)

#ridespin

04.19.18

SCOOTER 101

**PARK NEXT TO  
BIKE RACKS.  
EVERYBODY WINS.**



SPIN  
Download to ride at [www.spin.pm](http://www.spin.pm)

#ridespin

04.19.18

SCOOTER 101

**RIDE ON THE STREET -  
THEY'RE CALLED  
SIDEWALKS FOR  
A REASON.**



**SPIN**  
Download to ride at [www.spin.pm](http://www.spin.pm)

[#ridespin](https://www.instagram.com/ridespin)

04.19.18

**g. Strategies for incorporating features into system functionality to address parking, helmet use and roadway safety**

See descriptions of our strategies in Section 5(b).



# Engagement



### a. Plan for community engagement.

Spin's partnership-first approach informs every aspect of how our company operates and conducts itself, including our community engagement efforts. We endeavor to be a part of the community in each of our cities and campuses, working closely with governments, universities, and local stakeholders to tailor our dockless mobility services and be responsive to the community. These efforts include, among others, partnering with local community groups, helping local businesses and employers, and providing low-income access to our services.

#### Community Outreach Going Forward

If granted a permit, Spin will engage with the Santa Monica community and demonstrate our commitment to being a good partner with the City.

- **Contracting with local shops:** In any market, Spin seeks to work with local shops, such as bike shops, to assist in the operations or maintenance of our fleet, and we proactively reach out to local businesses to gauge their interest in such partnerships.
- **Spin Local:** Spin Local supports local merchants by driving sustainable traffic to their brick-and-mortar stores. For our Spin Local partners, we provide a QR code that can be scanned in the store by Spin users to receive a refund on their ride or a ride credit, and we typically ask our Spin Local partners to assess some sort of discount as well. Our Spin Local partnerships also include collaborating on cross-promotional initiatives, such as organized rides or providing scooters for a storefront event.
- **Spin for Business:** Spin for Business helps employers and organizations wishing to promote alternative and sustainable mobility modes for their employees and visitors. Our Spin for Business partners are guaranteed a certain number of Spin scooters at their location on a regular basis. Spin for Business can be tailored to meet the needs of our partners – such as allowing for employer-subsidized rides or providing an introductory promotional rate for employees.
- **Community events:** Spin proudly works with local agencies and community groups to promote safer streets, raise awareness of alternative mobility options, and sponsor public events. In fact, we welcome any invitations or requests from the community, and we always try our best to participate and be a good neighbor. In the past, we have participated in, promoted, or sponsored a wide variety of causes and events, such as helping to fund protected bike lanes, educating low-income residents at mobility open

houses, providing promo codes for city-sponsored events, and partaking in community holiday parades.

- **Multicultural Communities:** Spin is responsive to our communities and the people who make up them, ranging from promoting dockless mobility at Seattle’s Pride Fest to providing multilingual materials to interested businesses in adjacent Bay Area cities. In Santa Monica, we plan to be proactive and responsive by designing and distributing multilingual literature and education to promote Spin scooter-share and Spin Access.

In particular, as we describe below in detail, we hope to leverage our multilingual materials and resources, including our multilingual employees, to go beyond our efforts in other partner cities by promoting and increasing participation in Spin’s scooter-share in low-income and diverse communities through on-the-ground community outreach events. See below for examples of multilingual materials and resources.



- **Equitable Implementation:** Spin aims to serve every community in Santa Monica, but we are particularly eager to provide personal mobility options to lower-income and diverse residents. In fact, Spin hopes to help cities achieve what other mobility modes have thus far struggled to – transportation equity.

At Spin, we think our scooter-share program – which does not receive public funding – may be uniquely positioned to help improve transportation equity in certain priority neighborhoods by serving as a complementary or short-term measure until additional budget capacity for capital improvements is made available.

In addition to effectively serving disadvantaged communities, Spin's equity programming will include our Spin Access program, which provides low-income residents a reduced rate and the ability to pay for rides using cash. Eligible residents can be discussed further upon issuance of permits. Residents wishing to sign up for our Spin Access low-income program can simply fill out the online application form, register in-person at one of our community events, or work directly with one of our community liaisons. Spin Access also provides eligible low-income residents who are unbanked with access to our scooters at the same discounted rate. Eligible low-income residents can use cash to purchase a Spin Access card at partner locations. Each Spin Access card will have a unique promo code that the user can enter into the app to "deposit" the Spin Access card's balance into their Spin app account.

- **Low-income community outreach:** Spin believes that any successful equity programming must include good-faith outreach to the communities we hope to serve by demonstrating to residents the tangible advantages and opportunities of Spin's scooters. Focusing on affordability and convenience, we hope to generate interest and participation among low-income communities in a way that makes Spin's equity programming meaningful.

Once permitted to operate in Santa Monica, Spin plans further community engagement by conducting meet-and-greets with disadvantaged and low-income community leaders. To raise awareness in these communities and drive participation in our scooter-share program, Spin also plans to conduct community outreach events. These community-based events will be advertised in advance and will include social-media outreach, emails, community liaisons on the ground, and flyers/literature distributed.

The community outreach events will allow Spin's community liaisons to educate prospective users about our scooter-share program, provide educational demonstrations of the scooters including proper usage and parking, help interested residents download the Spin app and create an account, and sign up in-person for Spin Access including the opportunity to purchase Spin Access cards with cash. Our community liaisons will also assist with securing or providing any translation or interpretation materials and services to ensure that our community outreach events are accessible.

**b. Plan to implement safety programs.**

As described in detail in Section 5, Spin has various safety programs to offer our partner communities, including:

- User education and notification via mobile application, scooter, and email.
- Public education via social media, website, flyers, and community events.
- Helmet giveaways at community events.

Please see Section 5 for more details.

**c. Plan for public information and education to users and non-users.**

As previously described in Section 5, Spin has various measures to educate the public and our users about our scooters, including:

- Informational Pop-Ups
- In-App Push Notifications
- Emails
- Parking Rating Tool
- On-Scooter Education
- Online Education
- On-the-Ground Education
- Parking Signs and Zones/Virtual Stations

Please see Section 5 for additional details.

#### d. Marketing program.

We believe that the best form of marketing Spin is executing our operations at the highest level possible. This means having a dependable fleet; quick turnaround times for support requests; and strong relationships with the local community. These are things that we strive for in every new market and are always working to improve.

When our day-to-day operations are running at a high level, we are able to generate a tremendous amount of awareness and ridership through word of mouth, in addition to the inherent visibility of our orange scooters. By giving our users the best experience possible and accommodating the surrounding community to the best of our ability, we create positive conversation around Spin that leads to more ridership.

In addition to executing our operations at a high level, we also employ traditional marketing tactics to generate buzz and awareness in the local community. Our primary goals with these marketing tactics are to educate people about our form of free-floating mobility and to bring new users onto the service. We may use all or only a few of the below strategies – with the exact mix and spend depending on community needs, public reaction to the service, and ridership.

#### Strategies

- Local Media Placement: Reach out to local reporters and pitch stories about Spin and our new form of dockless mobility. The primary goal here is to educate the public as to what this new service is, how it works, and how to ride.
- Launch Day Events: Setting up tables and booths around town to bring users onto the service and generate ridership. These will be staffed by persons whose primary goal will be to educate passersby about Spin and encourage them to sign up for the service.
- Digital Advertising: Running ads across a multitude of digital channels, all with the purpose of driving downloads to the Spin app. We will use a mix of social media and other channels to get in front of potential users and convert them into riders.
- OOH Advertising: Using traditional out-of-home advertising to generate awareness and ridership in the community, such as bus stop posters, flyer placement, and, of course, the visibility of the scooters themselves.

**e. Ability to achieve interoperability or integration with other modes of transportation.**

Depending on the technological factors involved, Spin has the ability to integrate our app and services with other modes of transportation provided in Santa Monica. We look forward to learning more about the City's ideas and to working with the City on interoperability agreements that prove beneficial to the broader transportation network in the area.



**Data**



**a. Scope and specifications of data available, including ability to meet the LADOT Mobility Data Specifications**

All usage data generated by Spin's scooter-sharing program is collected and stored, including, but not limited to, trip origins and destinations, trip length and route, user sign-ups, sign-ups for Spin Access, parking rating data, etc. Spin does not collect or maintain payment information of our users, and we do not sell our data to third parties or send them to foreign entities.

Spin is able to meet all of the LADOT Mobility Data Specification requirements and will work with the City to determine which of the optional Specifications the City would like included.

### **b. Method of tracking device utilization and availability**

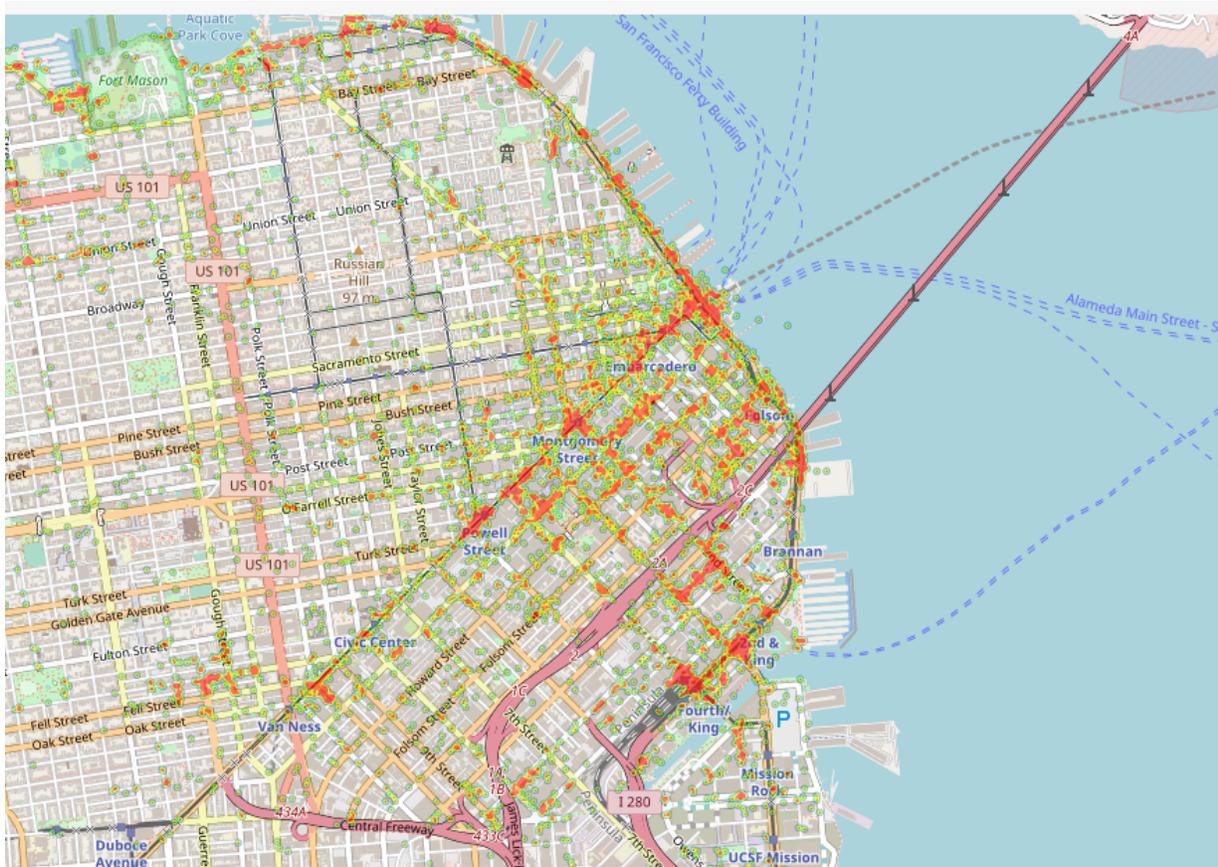
Every Spin scooter is outfitted with a controller box, which contains a GPS unit and wireless communication capabilities. Together with the user's phone (only if the user grants permission), the scooter tracks data that include start and end location, duration, and cost. When the vehicle's vitality stats indicate that a scooter's battery has dropped below a certain percentage, the vehicle is taken offline and is unable to be rented. When a scooter is not available, whether it be for low battery or for maintenance, the scooter no longer shows in the user's in-app map.

**c. Method of making data available to the City, including components/details of a data dashboard. Include screenshots, and provide examples of any similar monthly reports.**

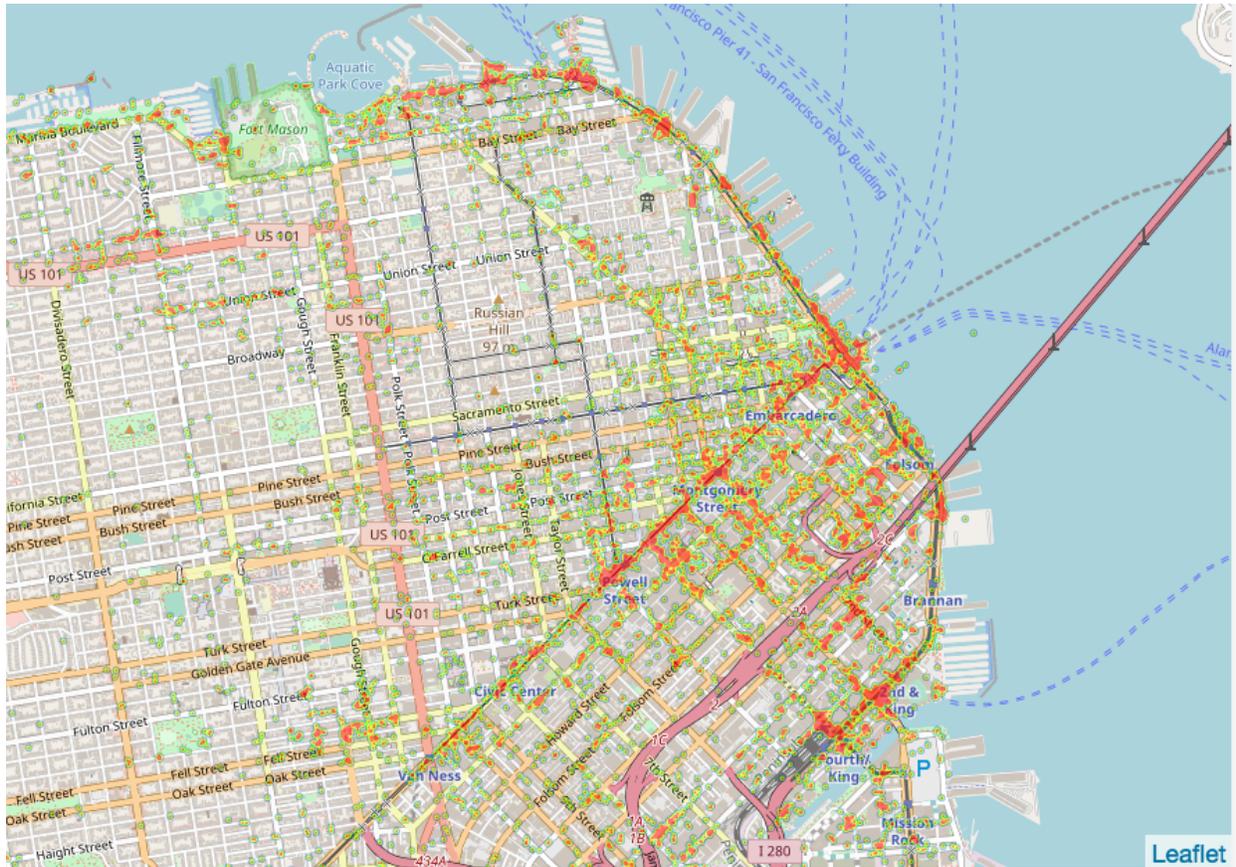
Spin is able to provide the City with data through a variety of methods, including a web-based dashboard and monthly reporting, such as heatmaps of trip origin/destination, average trip durations, etc. Ultimately, Spin would like to provide the City with whatever data is needed or required, as long as the data is anonymized and aggregated, with company-specific identifiers removed before public disclosure.

Below are heat maps from Spin's scooter pilot in San Francisco for April 2018.

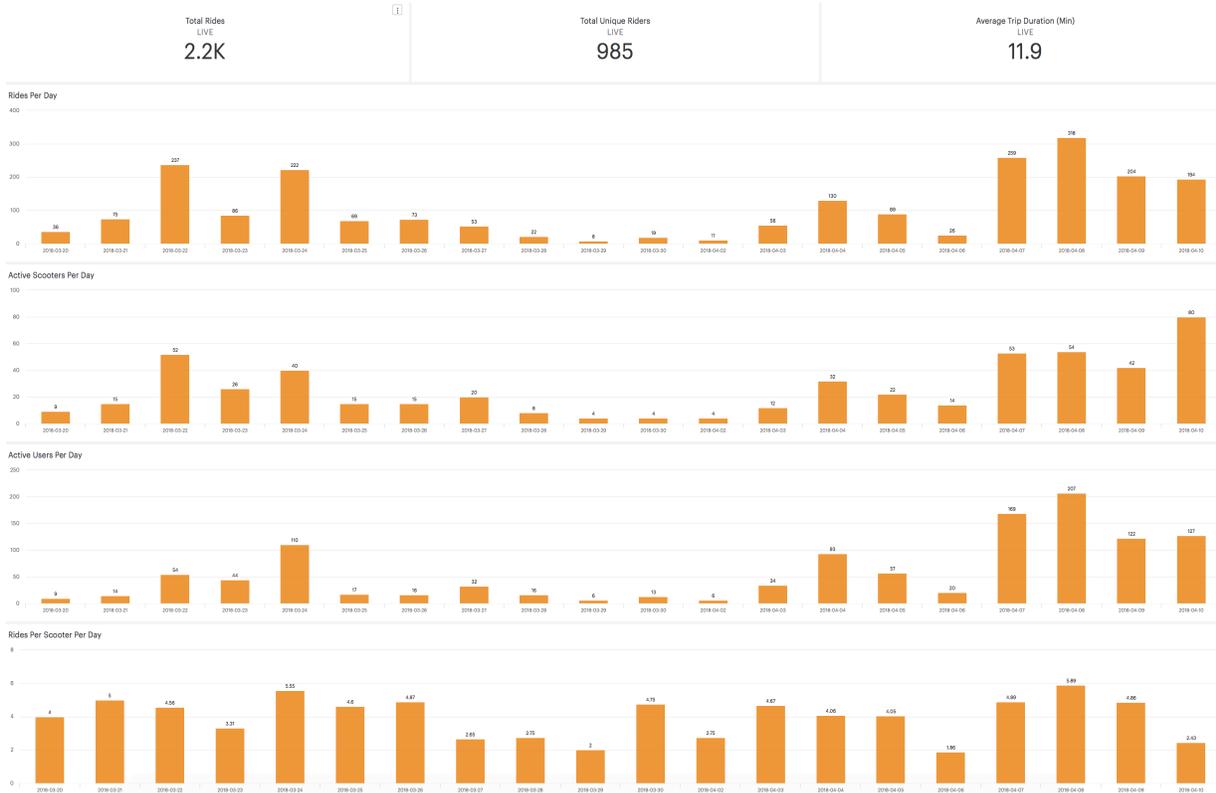
*Start locations*



### End locations



Additionally, Spin is able to provide monthly data metrics that addresses the City of Santa Monica's needs. The below snapshot is an example of such a dashboard report and can be tailored accordingly.



Finally, some cities also ask us to provide an API for real-time data, which we could provide Santa Monica.

#### **d. Plan for monitoring system effectiveness, customer satisfaction, and municipal relationships over time**

Spin's key performance indicator (KPI) is simply trips/scooter/day. Contrary to a few of our competitors, we focus on system efficiency rather than overwhelming the streets with scooters or bikes. We also track trip length, origin/destination trends, low turnover areas, etc., and will adjust our operations based on trends that emerge.

Customer satisfaction is tracked by the number of complaints we receive per 100 trips. Our customer service and engineering teams work tirelessly every day to adjust our service based on trends in customer complaints.

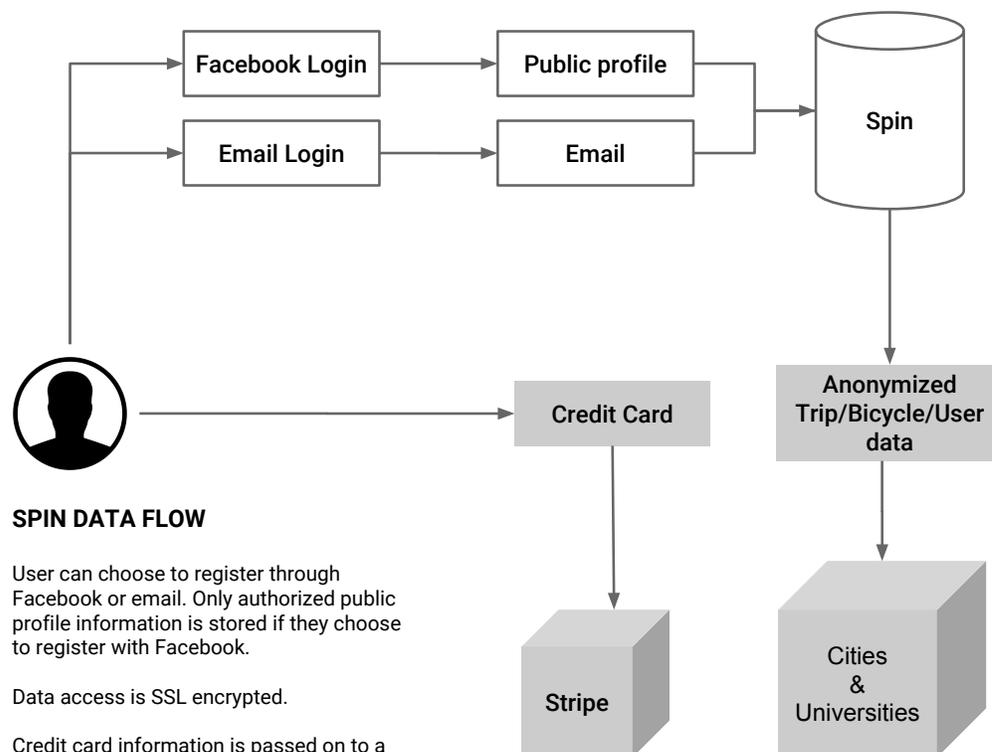
Lastly, Spin's partnership-first model means that we value our municipal relationships to the highest degree. Spin's Policy team will always be available to the City of Santa Monica staff should an issue arise. Throughout the pilot, Spin's Policy team would seek to schedule regular check-ins with City staff and visit Santa Monica for in-person meetings whenever necessary.

**e. Plan to comply with financial privacy laws and best practices. Provide your most recent third-party PCI audit. Plan to protect personal customer data.**

Spin values our users' data. As such, we comply with all applicable data security laws, and we ensure that any data collected is not sent overseas.

## Financial Privacy

As shown in the diagram below, Spin does not store or process any financial data, and instead relies on a third-party payment processor, Stripe, for all transactions.



### SPIN DATA FLOW

User can choose to register through Facebook or email. Only authorized public profile information is stored if they choose to register with Facebook.

Data access is SSL encrypted.

Credit card information is passed on to a secure third party service, Stripe.

All data share with cities and universities are anonymized.

## PCI Audit

Our iOS and Android apps use Stripe to accept payments, and we do not handle payment information directly. With regards to handling payment information, Spin does the following:

- use Stripe's mobile SDK libraries to collect credit card information, which is securely transmitted directly to Stripe without it passing through our servers;

- serve our payment pages securely using Transport Layer Security (TLS) so that they make use of HTTPS; and
- review and validate PCI compliance annually.

Stripe has been audited by an independent PCI Qualified Security Assessor (QSA) and is certified as a PCI Level 1 Service Provider. This is the most stringent level of certification available in the payments industry. We adhere to the guidelines in Stripe's security documentation at <https://stripe.com/docs/security>, and we are PCI compliant.

Stripe, Inc CA, U.S.A.	AGENT	PCI DSS	PCI DSS Services <ul style="list-style-type: none"> <li>• Clearing and Settlement</li> <li>• Issuer Processing</li> <li>• Merchant Services</li> <li>• Payment Gateway/Switch</li> <li>• Payment Processing: Internet / e-commerce</li> <li>• Payment Processing: MOTO / Call Center</li> <li>• Payment Processing: POS / card present</li> </ul>	Mar 31, 2019	Securisea, Inc.	AP, LAC, U.S., CAN	<a href="#">Collapse</a>
		VISA TPA PROGRAM (HR ISO)	VISA TPA PROGRAM (HR ISO) Services <ul style="list-style-type: none"> <li>• High Risk Merchant solicitation, sales, customer service, training</li> </ul>	NOT APPLICABLE	NOT APPLICABLE	AP, LAC, U.S., CAN	
		VISA TPA PROGRAM (ISO-M)	VISA TPA PROGRAM (ISO-M) Services <ul style="list-style-type: none"> <li>• Merchant solicitation, sales, customer service, training</li> </ul>	NOT APPLICABLE		AP, LAC, U.S., CAN	

(source: <https://www.visa.com/splisting/searchGrsp.do?companyNameCriteria=stripe>)

In addition, please see below for Spin's SAQ.

# Self-Assessment Questionnaire A and Attestation of Compliance

Version 3.2

## Section 1: Assessment Information

### Part 1. Merchant and Qualified Security Assessor Information

#### Part 1a. Merchant Organization Information

Company Name: Skinny Labs Inc.  
DBA(s): spin.pm  
Contact Name: Zaizhuang Cheng  
Title: Company Representative  
Telephone: 4158917591  
Email: zaizhuang@spin.pm  
Business Address: 164 South Park St  
City: San Francisco  
State: CA  
Zip: 94107  
Country: US  
URL: spin.pm

#### Part 1b. Qualified Security Assessor Company Information (if applicable)

Company Name: N/A

### Part 2. Executive Summary

#### Part 2a. Type of Merchant Business (check all that apply)

- Retailer
  - Telecommunication
  - Grocery and Supermarkets
  - Petroleum
  - E-Commerce
  - Mail order/telephone order (MOTO)
  - Others
- What types of payment channels does your business serve?
- Mail order/telephone order (MOTO)
  - E-Commerce

- Card-present (face-to-face)  
Which payment channels are covered by this SAQ?  
 Mail order/telephone order (MOTO)  
 E-Commerce  
 Card-present (face-to-face)

**Part 2b. Description of Payment Card Business**

How and in what capacity does your business store, process and/or transmit cardholder data?

We do not store, process and/or transmit cardholder data

**Part 2c. Locations**

List types of facilities (for example, retail outlets, corporate offices, data centers, call centers, etc.) and a summary of locations included in the PCI DSS review.

N/A

**Part 2d. Payment Application**

Does the organization use one or more Payment Applications? NO

Provide the following information regarding the Payment Applications your organization uses: N/A

**Part 2e. Description of Environment**

Provide a high-level description of the environment covered by this assessment:

E-commerce: Our customers dispatch all cardholder data securely to Stripe, our payments processor, via an iframe. Our company's servers receive an opaque token object, from which the original cardholder data cannot be derived.

Does your business use network segmentation to affect the scope of your PCI DSS environment? YES

**Part 2f. Third-Party Service Providers**

Does your company use a Qualified Integrator & Reseller (QIR)? NO

Does your company share cardholder data with any third-party service providers (for example, Qualified Integrator & Resellers (QIR), gateways, payment processors, payment service providers (PSP), web-hosting companies, airline booking agents, loyalty program agents, etc.)? YES

Name of service provider: Stripe, Inc.

Description of services provided: Collection, storage and processing of all cardholder data.

**Part 2g. Eligibility to Complete SAQ A**

Merchant certifies eligibility to complete this shortened version of the Self-Assessment Questionnaire because, for this payment channel:

Merchant accepts only card-not-present (e-commerce or mail/telephone-order) transactions);

All processing of cardholder data is entirely outsourced to PCI DSS validated third-party service providers;

[x] Merchant does not electronically store, process, or transmit any cardholder data on merchant systems or premises, but relies entirely on a third party(s) to handle all these functions;

[x] Merchant has confirmed that all third party(s) handling storage, processing, and/or transmission of cardholder data are PCI DSS compliant; and

[x] Any cardholder data the merchant retains is on paper (for example, printed reports or receipts), and these documents are not received electronically.

[x] Additionally, for e-commerce channels: All elements of the payment page(s) delivered to the consumer's browser originate only and directly from a PCI DSS validated third-party service provider(s)

## **Section 2: Self-Assessment Questionnaire A**

### **Completion of a Self-Assessment Questionnaire**

The assessment documented in this attestation and in the SAQ was completed on:  
2017-06-11

Have compensating controls been used to meet any requirement in the SAQ? No

Were any requirements in the SAQ identified as being not applicable (N/A)? Yes

Were any requirements in the SAQ unable to be met due to a legal constraint? No

### **Requirement 2: Build and Maintain a Secure Network and Systems**

2.1.a: Are vendor-supplied defaults always changed before installing a system on the network? N/A

2.1.b: Are unnecessary default accounts removed or disabled before installing a system on the network? N/A

### **Requirement 8: Identify and authenticate access to system components**

8.1.1: Are all users assigned a unique ID before allowing them to access system components or cardholder data? N/A

8.1.3: Is access for any terminated users immediately deactivated or removed? N/A

8.2: In addition to assigning a unique ID, is one or more of the following methods employed to authenticate all users? N/A

8.2.3.a: Are user password parameters configured to require passwords/passphrases meet the following? N/A

8.5: Are group, shared, or generic accounts, passwords, or other authentication methods prohibited as follows: N/A

### **Requirement 9: Restrict physical access to cardholder data**

9.5: Are all media physically secured (including but not limited to computers, removable electronic media, paper receipts, paper reports, and faxes)? N/A

9.6.a: Is strict control maintained over the internal or external distribution of any kind of media? N/A

9.6.1: Is media classified so the sensitivity of the data can be determined? N/A

9.6.2: Is media sent by secured courier or other delivery method that can be accurately tracked? N/A

9.6.3: Is management approval obtained prior to moving the media (especially when media is distributed to individuals)? N/A

9.7: Is strict control maintained over the storage and accessibility of media? N/A

9.8.a: Is all media destroyed when it is no longer needed for business or legal reasons? N/A

9.8.1.a: Are hardcopy materials cross-cut shredded, incinerated, or pulped so that cardholder data cannot be reconstructed? N/A

9.8.1.b: Are storage containers used for materials that contain information to be destroyed secured to prevent access to the contents? N/A

### **Requirement 12: Maintain a policy that addresses information security for all personnel**

12.8.1: Is a list of service providers maintained, including a description of the service(s) provided? YES

12.8.2: Is a written agreement maintained that includes an acknowledgement that the service providers are responsible for the security of cardholder data the service providers possess or otherwise store, process, or transmit on behalf of the customer, or to the extent that they could impact the security of the customer's cardholder data environment? YES

12.8.3: Is there an established process for engaging service providers, including proper due diligence prior to engagement? YES

12.8.4: Is a program maintained to monitor service providers' PCI DSS compliance status at least annually? YES

12.8.5: Is information maintained about which PCI DSS requirements are managed by each service provider, and which are managed by the entity? YES

12.10.1.a: Has an incident response plan been created to be implemented in the event of system breach? YES

## **Section 3: Validation and Attestation Details**

### **Part 3. PCI DSS Validation**

Based on the results noted in the SAQ A dated 2017-06-11, the signatories identified in Parts 3b-3d, as applicable, assert(s) the following compliance status for the entity identified in Part 2 of this document as of 2017-06-11 (check one):

Compliant: All sections of the PCI DSS SAQ are complete, and all questions answered affirmatively, resulting in an overall COMPLIANT rating, thereby Skinny Labs Inc. has demonstrated full compliance with the PCI DSS.

Non-Compliant: Not all sections of the PCI DSS SAQ are complete, or not all questions are answered affirmatively, resulting in an overall NON-COMPLIANT rating, thereby Skinny Labs Inc. has not demonstrated full compliance with the PCI DSS.

Target Date for Compliance: N/A

An entity submitting this form with a status of Non-Compliant may be required to complete the Action Plan in Part 4 of this document. Check with your acquirer or the payment brand(s) before completing Part 4.

Compliant but with Legal exception. One or more requirements are marked "No" due to a legal restriction that prevents the requirement from being met. This option requires additional review from acquirer or payment brand.

### **Part 3a. Acknowledgement of Status**

[x] This PCI DSS Self-Assessment Questionnaire, Version 3.2, was completed according to the instructions therein.

[x] All information within the above-referenced SAQ and in this attestation fairly represents the results of my assessment in all material respects.

[x] I have confirmed with my payment application vendor that my payment system does not store sensitive authentication data after authorization.

[x] I have read the PCI DSS and I recognize that I must maintain PCI DSS compliance, as applicable to my environment, at all times.

[x] If my environment changes, I recognize I must reassess my environment and implement any additional PCI DSS requirements that apply.

[x] No evidence of full track data1, CAV2, CVC2, CID, or CVV2 data2, or PIN data storage after transaction authorization was found on ANY system reviewed during this assessment.

[x] ASV scans are being completed by the PCI SSC Approved Scanning Vendor (ASV Name).

### **Part 3b. Merchant Attestation**

Signature of Merchant Executive Officer: Zaizhuang Cheng

Date: 2017-06-11

Merchant Executive Officer Name: Zaizhuang Cheng

Title: Company Representative

Merchant Company Represented: Skinny Labs Inc.

### **Part 3c. Qualified Security Assessor (QSA) Acknowledgement (if applicable)**

If a QSA was involved or assisted with this assessment, describe the role performed: N/A

### **Part 3d. Internal Security Assessor (ISA) Acknowledgement (if applicable)**

If an ISA(s) was involved or assisted with this assessment, identify the ISA personnel and describe the role performed: N/A

## **Part 4. Action Plan for Non-Compliant Requirements**

Select the appropriate response for "Compliant to PCI DSS Requirements" for each requirement. If you answer "No" to any of the requirements, you may be required to provide the date your Company expects to be compliant with the requirement and a brief description of the actions being taken to meet the requirement.

PCI DSS Requirement 2: Do not use vendor-supplied defaults for system passwords and other security parameters. N/A

PCI DSS Requirement 8: Identify and authenticate access to system components. N/A

PCI DSS Requirement 9: Restrict physical access to cardholder data. N/A

PCI DSS Requirement 12: Maintain a policy that addresses information security for all personnel. Yes

## **Explanation of Non-Applicability**

Reason Requirement is Not Applicable: No part of our environment, including any type of media, transmits, stores or processes cardholder data. As such, there is no cardholder data to restrict access to.

**f. Describe what, if any, user data you intend to collect and sell; and if so how this will be communicated to users and how they will be able to opt-out.**

Spin describes the type of data collected and the purpose for the collection as part of the user's sign-up process, requiring the user to agree to our privacy policy, user agreement, and terms of service before being able to rent our scooters.

Users have the option of signing up through email or Facebook. Through the Facebook sign-up option, we only collect data that the user has already authorized for sharing via their public profile. We then use Stripe, a third-party online payment system, to store and process all payments for our service. When the user takes a trip, we collect location information of our vehicle throughout the duration of the trip.

The user can access and modify the personal information that they have opted to share or that we have collected. Spin also offers the option to delete their account and have all their personal information removed upon request.

We document all access to our database including for the use of data processing. We also occasionally share anonymized data to cities and government entities for research purposes. Other than that, we use the data collected to figure out how to operate our business more efficiently.

We are very careful when deciding what data to ask for or store. Therefore, we only store the user's email address and what they have opted to share from their Facebook public profile.

Spin has no intent to sell any data collected at any point in time.





# **Non-Discrimination Policy Acknowledgment**



## EXHIBIT A



### **City of Santa Monica Non-Discrimination Policy Acknowledgment**

#### A. Discrimination.

Discrimination in the provision of services may include, but not be limited to the following:

- (a) Denying any person any service, or benefit or the availability of a facility.
  - (b) Providing any service, or benefit to any person which is not equivalent, or in a non-equivalent manner or at a non-equivalent time, from that provided to others.
  - (c) Subjecting any persons to segregation or separate treatment in any manner related to the receipt of any service.
  - (d) Restricting any person in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service or benefit.
  - (e) Treating any person differently from others in determining admission, enrollment, quota, eligibility, membership, or any other requirement or condition which persons must meet in order to be provided any service or benefit.
- (1) Consultant shall take affirmative action to ensure that intended beneficiaries of this Agreement are provided services without regard to race, color, religion, national origin, ancestry, sex, age, sexual orientation, marital status, AIDS or disability.
- (2) Consultant shall further establish and maintain written procedures under which any person applying for or receiving services hereunder, may seek resolution from Consultant of a complaint with respect to any alleged discrimination in the provision of services by Consultant's personnel.

At any time any person applies for services under this Agreement, he or she shall be advised by Consultant of these procedures. A copy of these procedures shall be posted by Consultant in a conspicuous place, available and open to the public, in each of Consultant's facilities where services are provided hereunder.

#### B. Non-discrimination in Employment

- (1) Consultant certifies and agrees that it will not discriminate against any employee or applicant for employment because of race, color, religion, national origin, ancestry, sex, age, sexual orientation, marital status, AIDS or disability in accordance with the requirements of City, State or Federal law. Consultant shall take affirmative action to ensure that qualified applicants are employed, and that employees are treated during employment, without regard to race, color, religion, national origin, ancestry, sex, age, sexual orientation, marital status, AIDS or disability, in accordance with the requirements of City, State and Federal law. Such shall include, but not be limited to, the following:
- (a) Employment, upgrading, demotion, transfer, recruitment or recruitment advertising, layoff or termination, rates of pay or other forms of compensation.
  - (b) Selection for training, including apprenticeship.

- (2) Consultant agrees to post in conspicuous places in each of Consultant's facilities providing services hereunder, available and open to employees and applicants for employment, notices setting forth the provisions of this non-discrimination policy.
- (3) Consultant shall, in all solicitations or advertisements for employees placed by or on behalf of Consultant, state that all qualified applicants will receive consideration for employment without regard to race, color, religion, national origin, ancestry, sex, age, sexual orientation, marital status, AIDS or disability, in accordance with the requirements of City, State or Federal law.
- (4) Consultant shall send to each labor union or representative coworkers with which it has a collective bargaining agreement or other contract or understanding a notice advising the labor union or workers' representative of Consultant's commitments under this non-discrimination policy.
- (5) Consultant certifies and agrees that it will deal with its sub-consultants, bidders, or vendors without regard to race, color, religion, national origin, ancestry, sex, age, sexual orientation, marital status, AIDS or disability, in accordance with the requirements of City, State and Federal law.
- (6) In accordance with applicable State and Federal law, Consultant shall allow duly authorized representatives of the County, State, and Federal government access to its employment records during regular business hours in order to verify compliance with this non-discrimination policy. Consultant shall provide other information and records as the representatives may require in order to verify compliance with this non-discrimination policy.
- (7) If City finds that any of the provisions of this non-discrimination policy have been violated, the same shall constitute a material breach of agreement upon which City may determine to cancel, terminate, or suspend this Agreement. While City reserves the right to determine independently that this nondiscrimination policy has been violated, in addition, a determination by the California Fair Employment and Housing Commission or the Federal Equal Employment Opportunity Commission that Consultant has violated State or Federal non-discrimination laws shall constitute a finding by City that Consultant has violated the provisions of this non-discrimination policy.
- (8) The parties agree that in the event Consultant violates any of the non-discrimination policies set forth herein, City shall be entitled, at its option, to the sum of five hundred dollars (\$500) pursuant to Civil Code Section 1671 as liquidated damages in lieu of canceling, terminating or suspending this Agreement.
- (9) Consultant hereby agrees that it will comply with Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794), all requirements imposed by applicable Federal Regulations, and all guidelines and interpretations issued pursuant thereto, to the end that no qualified disabled person shall, on the basis of disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity of the Consultant receiving Federal Financial Assistance.



7/27/18

Spin

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Signature/Date

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Name of Proposer





# Non-Collusion Affidavit





EXHIBIT B

**NON-COLLUSION DECLARATION TO ACCOMPANY PROPOSALS OR BIDS**

STATE OF CALIFORNIA        }  
COUNTY OF LOS ANGELES }

\_\_\_\_\_ Derrick Ko \_\_\_\_\_, being first duly sworn, deposes, and says: that He/She is:

A Partner

\_\_\_\_\_ (Insert "Sole Owner," "A Partner", "President," "Secretary," or other proper title)

of \_\_\_\_\_ Spin \_\_\_\_\_

(Insert name of proposer)

Who submits herewith to the City of Santa Monica the attached proposal; that He, She, It, or They is (are) the person(s) whose name(s) is (are) (strike out words not appropriate) signed to the hereto attached proposal; that said proposal is genuine; that the same is not sham or collusive; that all statements of fact therein are true; that such proposal was not made in the interest or on behalf of any person, partnership, company, association, organization or corporation not therein named or disclosed.

Declarant further deposes and says: that the proposer has not directly or indirectly by agreement, communication or conference with anyone attempted to induce action prejudicial to the interests of the public body which is to award the contract or of any other proposer, or anyone else interested in the proposed contract; that the proposer has not in any manner sought by collusion to secure for himself, herself, itself, or themselves, an advantage over any other proposer. (strike out words not appropriate)

Declarant further deposes and says that prior to the public opening and recording of proposals the said proposer:

- (a) Did not, directly or indirectly, induce or solicit anyone else to submit a false or sham Proposal;
- (b) Did not, directly or indirectly, collude, conspire, connive or agree with anyone else that said proposer or anyone else would submit a false or sham proposal, or that anyone should refrain from proposing or withdraw his/her proposal;
- (c) Did not, in any manner, directly or indirectly, seek by agreement, communication or conference with anyone to raise or fix any overhead, profit or cost element of his, her, its, their price, or of that of anyone else; and
- (d) Did not, directly or indirectly, submit his, her, its, or their proposal price or any breakdown thereof, or the contents thereof, or divulge information or data relative thereto, to any corporation, partnership, company, association, organization, depository, or to any member or agent thereof, or to any individual or group of individuals, except to the awarding authority or to any person or persons who have a partnership or other financial interest with said proposal in his, her, its, or their business. (strike out words not appropriate)

I declare under penalty of perjury that the foregoing is true and correct.

 7/27/18

\_\_\_\_\_  
Signature/Date

Spin

\_\_\_\_\_  
Name of Proposer



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# Oaks Initiative Disclosure Form

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## EXHIBIT C

### **CITY OF SANTA MONICA OAKS INITIATIVE NOTICE**

#### **NOTICE TO APPLICANTS, BIDDERS, PROPOSERS AND OTHERS SEEKING DISCRETIONARY PERMITS, CONTRACTS, OR OTHER BENEFITS FROM THE CITY OF SANTA MONICA**

Santa Monica's voters adopted a City Charter amendment commonly known as the Oaks Initiative. The Oaks Initiative requires the City to provide this notice and information about the Initiative's requirements. You may obtain a full copy of the Initiative's text from the City Clerk.

This information is required by City Charter Article XXII—Taxpayer Protection. It prohibits a public official from receiving, and a person or entity from conferring, specified personal benefits or campaign advantages from a person or entity after the official votes, or otherwise takes official action, to award a "public benefit" to that person or entity. The prohibition applies within and outside of the geographical boundaries of Santa Monica.

All persons or entities applying or receiving public benefits from the City of Santa Monica shall provide the names of trustees, directors, partners, and officers, and names of persons with more than a 10% equity, participation or revenue interest. An exception exists for persons serving in those capacities as volunteers, without compensation, for organizations exempt from income taxes under Section 501(c)(3), (4), or (6), of the Internal Revenue Code. However, this exception does not apply if the organization is a political committee or controls political committees. Examples of a "public benefit" include public contracts to provide goods or services worth more than \$25,000 or a land use approval worth more than \$25,000 over a 12-month period.

In order to facilitate compliance with the requirements of the Oaks Initiative, the City compiles and maintains certain information. That information includes the name of any person or persons who is seeking a "public benefit." If the "public benefit" is sought by an entity, rather than an individual person, the information includes the name of every person who is: (a) trustee, (b) director, (c) partner, (d) officer, or has (e) more than a ten percent interest in the entity. Therefore, if you are seeking a "public benefit" covered by the Oaks Initiative, you must supply that information on the Oaks Initiative Disclosure Form. This information must be updated and supplied every 12 months.



### CITY OF SANTA MONICA OAKS INITIATIVE DISCLOSURE FORM

In order to facilitate compliance with the requirements of the Oaks Initiative, the City compiles and maintains certain information. That information includes the name of any person or persons who is seeking a “public benefit.” If the “public benefit” is sought by an entity, rather than an individual person, the information includes the name of every person who is: (a) trustee, (b) director, (c) partner, (d) officer, or has (e) more than a ten percent interest in the entity.

Public benefits include:

1. Personal services contracts in excess of \$25,000 over any 12-month period;
2. Sale of material, equipment or supplies to the City in excess of \$25,000 over a 12-month period;
3. Purchase, sale or lease of real property to or from the City in excess of \$25,000 over a 12- month period;
4. Non-competitive franchise awards with gross revenue of \$50,000 or more in any 12-month period;
5. Land use variance, special use permit, or other exception to an established land use plan, where the decision has a value in excess of \$25,000;
6. Tax “abatement, exception, or benefit” of a value in excess of \$5,000 in any 12-month period; or
7. Payment of “cash or specie” of a net value to the recipient of \$10,000 in any 12-month period.

Name(s) of persons or entities receiving public benefit:

Spin

Name(s) of trustees, directors, partners, and officers:

Derrick Ko, CEO and Co-Founder; Euwyn Poon, President and Co-Founder;  
Zaizhuang Cheng, CPO and Co-Founder

Name(s) of persons with more than a 10% equity, participation, or revenue interest:

Derrick Ko, CEO and Co-Founder; Euwyn Poon, President and Co-Founder; Zaizhuang Cheng, CPO and Co-Founder; Grishin Robotics Fund LP

Prepared by: Derrick Ko Title: CEO

Signature:  Date: 7/27/18

Email: derrick@spin.pm Phone: (415) 519-9495

FOR CITY USE ONLY:	
Bid/PO/Contract # _____	Permit # _____