



Privacy Policy

A Product of Tumblehill Labs

the Product Studio of Tumblehill Holdings

Effective Date: 21 October 2026

Version 1.4

ev.geoatm.app

Version History

Version	Effective Date	Description
1.0	16 October 2026	Initial release
1.1	17 October 2026	Optional email updates
1.2	17 October 2026	Subscribers may give an area for local updates
1.3	21 October 2026	Anonymous area demand counts, usage counts you can switch off, and further charger data sources
1.4	21 October 2026	Drivers' charger reports (sections 3.1, 3.4, 5.1, 8, 10)

1. Introduction

GeoEV is a product of Tumblehill Labs, the product studio of Tumblehill Holdings (collectively, "Tumblehill", "we", "us", or "our"). GeoEV is a location-intelligence platform that helps drivers find electric vehicle (EV) charging stations, and provides charging operators, utilities and regulators with network visibility, performance reporting and coverage analysis.

This Privacy Policy ("Policy") explains how we collect, use, store, disclose and protect information when you access or use GeoEV, including the driver application at ev.geoatm.app, the information site at evhome.geoatm.app, the operator portal and regulator dashboard, and any associated services (collectively, the "Platform").

By accessing or using the Platform, you acknowledge that you have read and understood this Policy. If you do not agree, please discontinue use of the Platform.

2. Who We Are

- Product: GeoEV
- Product Studio: Tumblehill Labs
- Parent Entity: Tumblehill Holdings
- Platform: ev.geoatm.app and evhome.geoatm.app
- Privacy Contact: info@geoatm.app
- Primary Jurisdiction: State of Wyoming, United States of America (with support for additional jurisdictions as the Platform expands)

All privacy-related enquiries, data access requests and complaints should be directed to info@geoatm.app.

3. Information We Collect

GeoEV is designed to be used without an account. What we collect depends on how you use the Platform:

3.1 Drivers Using the App

- Your location, only if you choose to share it, to find chargers near you (see section 5)
- The place or charger you search for, and the filters you choose, such as plug type and minimum power
- Your chosen plug type, saved on your own device (in your browser's local storage) so the app remembers it; it is not sent to us as part of any profile
- Standard technical information sent by any browser, such as IP address, browser type and operating system, which our hosting provider processes to deliver the service
- Privacy-friendly usage counts (app opened, chargers viewed, directions requested, filters chosen, whether location was allowed, approximate country and city from your network, device type), collected without cookies and without identifying you. You can switch these off in the app
- Anonymous area demand counts, where you share your location or search for a place — described in section 5
- What you report about a charge, if you choose to, with a pseudonymous report identifier — described in section 5.1
- Your email address, and the area you give us, only if you choose to subscribe to GeoEV updates, on evhome.geoatm.app or in the app. The app may suggest the place you searched for; you can change or clear it. We also keep that place's map location — the place you named, not your own location — so we can tell which chargers are near it

3.2 Operators, Regulators and Platform Staff

- Business contact details for each organisation given access, such as organisation name and a contact email address
- Performance returns that operators submit for their own charging sites: for example monthly uptime, completed sessions, energy delivered, faults and repair times. These describe charging equipment, not drivers
- A sign-in record used to protect the dashboards, including the time of sign-in and the network address it came from, used for rate-limiting and security

3.3 Information from Third Parties

- Charging station locations, connectors, power, access and opening hours from OpenStreetMap, published by its contributors under the Open Database Licence (ODbL), cross-checked against official registers (the U.S. Department of Energy's Alternative Fuels Data Center, France's national IRVE register and Germany's Bundesnetzagentur register) and Open Charge Map
- Status and performance information submitted by participating operators

Where an operator does not provide live status, GeoEV displays publicly available location information only, and marks it "Status not reported". Such listings help you find chargers; they do not indicate that a charger is working or available.

3.4 Information We Do Not Collect

GeoEV does not collect, store or process:

- Payment card details, charging-network account credentials or charging session payments
- Vehicle identification numbers, licence plates or vehicle telematics
- Your name, or your email address unless you choose to subscribe to updates
- Biometric data of any kind
- A history of where you have been
- The location from which a charger report was sent

4. How We Use Information

- To show charging stations near you, filtered by the plug and power you choose, and to recommend the most suitable place to charge
- To give operators, utilities and regulators the dashboards, reports and coverage analysis they are authorised to see
- To keep the Platform secure, including limiting repeated sign-in attempts

- To monitor performance, diagnose errors and improve the Platform
- To respond to enquiries and support requests
- To send GeoEV update emails to people who have subscribed, including news about charging in the area they gave us, until they unsubscribe
- To comply with applicable legal and regulatory obligations

We do not use your information for advertising, do not build profiles of drivers, and do not sell personal information.

5. Location Data

- The app asks for your device location only when you choose "use my location". You can instead search for a place by name.
- When you share it, your location is sent to our servers only to retrieve chargers near that point, and is used for that request alone. We do not store it, attach it to an identity, or keep a history of your locations.
- Like any web request, the request may appear briefly in our hosting provider's operational logs, which are kept for a short period for security and reliability and are not used to track individuals.
- The Platform records anonymous area-level demand counts when you look for chargers near your location or a place you searched, noting whether a charger matching your filters was found within the defined search radius of 10 km. Counts are recorded only after the search has completed successfully; failed, incomplete or unavailable data retrievals are excluded to avoid misrepresenting infrastructure demand. Your device works out which area the search is for — a grid square about 2 km across — and sends only that area's identifier: no coordinates, IP address, device identifier or account is stored with the counts. The default map location shown before you share a location or search is never counted.
- Area demand counts are aggregated by geographic grid cell and reporting period. Areas with fewer than three recorded events in a month are excluded from reports and exports to reduce the risk of identifying individual users. These measures are designed to protect user privacy, although no aggregation method can guarantee absolute anonymity.

You can withdraw location permission at any time in your device or browser settings. Every other feature of the app continues to work.

Users may disable anonymous usage counts at any time through the "Share anonymous usage counts" setting on the Platform. When disabled, the Platform will cease collecting optional usage and area demand counts from that device. This choice does not affect access to charger locations or other core Platform functionality.

5.1 Reporting How a Charge Went

The app lets you report how a charge went: whether you charged, charged slowly or couldn't charge, with an optional reason or the speed you saw, chosen from fixed lists. Reporting is entirely optional; the app is fully usable without it.

- A report can only be sent from the charger itself. When you send one, your device location is used at that moment to confirm you are close enough to the charging site, and is then discarded. We do not store the coordinates from which a report was made.
- What we keep is the charger reported on, what you reported, the time of the report, the accuracy of the location reading, and how many charging sites were within range at that moment.
- To apply limits and to tell independent reports from repeated ones, we derive a pseudonymous identifier from a random value stored in your browser. There is no account behind it and it is not linked to your name, email address or any other identifier. The key used to derive it is rotated every ninety (90) days; after rotation, earlier reports can no longer be associated with your device.
- Reports are shown to other drivers only as anonymous, dated observations, such as “a driver charged here yesterday”. They never change a charger's status. Report counts may form part of the aggregated information described in section 6.6, which never identifies a driver.
- If you asked for directions to a charger, the app may later ask how the charge went. It remembers that charger only on your device, and nothing is sent unless you choose to report.

Reporting requires location permission. If you decline it, reporting is unavailable to you; every other feature is unaffected. Reports are sent only when you choose to, so the “Share anonymous usage counts” setting does not apply to them.

6. How We Share Information

Tumblehill does not sell personal information. We share information only as follows:

6.1 Service Providers

We use third-party providers for hosting, storage, email delivery and privacy-friendly analytics. They process data only on our instructions and consistently with this Policy.

6.2 Maps and Directions

Map images are loaded from OpenStreetMap's tile servers, which receive your IP address in order to send them. When you tap "Get Directions", your device opens Google Maps with the charger's location; your use of Google Maps is governed by Google's own terms and privacy policy.

6.3 Operators and Regulators

An operator's performance returns are visible to that operator and to Platform staff. They are shared with a regulator only when the operator releases them. Driver personal data is never included in any operator or regulatory view.

6.4 Legal Requirements

We may disclose information where required by law, court order or a lawful request from a competent authority.

6.5 Business Transfers

In the event of a merger, acquisition or sale of Tumblehill assets, information may be transferred as part of that transaction. We will give notice before any change to how it is processed.

6.6 Aggregated Infrastructure Intelligence

Tumblehill may use, publish, share or license aggregated and privacy-protected information derived from Platform usage to charging operators, utilities, infrastructure operators, regulators, researchers, investors and other commercial or institutional partners.

Such information may include geographic demand patterns, infrastructure coverage, service availability, accessibility gaps and related statistical insights.

Individual user identities, precise device locations and identifiable activity records are not included in these information products. Geographic data is subject to aggregation and minimum reporting thresholds designed to reduce re-identification risks.

7. Data Security

- Encryption of all data in transit using industry-standard TLS
- Operator returns stored encrypted at rest (AES-256-GCM)
- Operator access keys stored only as one-way hashes, never in readable form; signing in again is required whenever a key is replaced
- Signed, HTTP-only session cookies for the dashboards that expire after one working day
- Role-based access, so each organisation sees only what it is authorised to see
- Limits on repeated sign-in attempts

No system is entirely free of risk. If a breach presents a material risk to individuals, we will notify those affected and the relevant authorities as required by law.

8. Data Retention

- Driver location: not retained beyond the request it was used for
- Plug preference: kept on your device until you change it or clear your browser storage
- Usage statistics: kept in aggregate, non-identifying form for up to twenty-four (24) months

- **Charger reports:** individual reports are kept for up to ninety (90) days and then deleted; only aggregate counts, containing no device identifier, may be kept longer
- **Area demand counts:** kept indefinitely as daily totals per area, which contain no personal data
- **Operator returns:** kept for as long as the operator participates, and in line with any retention terms agreed with the operator or required by the relevant regulator
- **Organisation contact details:** kept while access is active and for twelve (12) months after it ends
- **Subscriber email addresses and areas:** kept until you unsubscribe, then deleted. Every update email includes a link to unsubscribe, and you can also ask us at info@geoatm.app

9. Your Rights

Tumblehill extends the following rights to every user as a matter of policy, wherever you live and in addition to any rights you hold under local law: the right of access, rectification, erasure, restriction, objection and data portability in respect of your personal data.

Because the driver app does not use accounts, we usually hold no personal data that can be linked to you, other than your email address if you subscribe to updates. To exercise any right, write to info@geoatm.app. We will acknowledge your request within five (5) business days and respond within thirty (30) days.

10. Cookies and Similar Technologies

The driver app and the information site do not use cookies for tracking or advertising. The app saves your plug choice, whether you have switched off usage counts, a random identifier used only for charger reports, and the last charger you asked directions to (so it can ask how the charge went) in your browser's local storage. The operator portal and regulator dashboard use one essential session cookie to keep you signed in. Usage statistics are collected without cookies.

11. Children's Privacy

The Platform is not directed at persons under eighteen (18). We do not knowingly collect personal data from minors. If you believe we have, contact info@geoatm.app and we will delete it promptly.

12. Jurisdiction and Cross-Border Transfers

Tumblehill Holdings LLC is organised under the laws of the State of Wyoming, United States of America, and this Policy and the GeoEV Terms of Use are governed by the laws of the State of Wyoming, without reference to its conflict of law principles. The Platform lists charging stations worldwide, compiled from publicly available and community-maintained data, and may be accessed from any country. Live status is provided only for operators who participate in the Platform. If you access the Platform from outside the United States, your data may be processed in the United States,

in Jamaica and in other countries where our service providers operate. Where the mandatory data protection law of your country grants you rights this Policy does not, those rights continue to apply.

13. Changes to This Policy

We may update this Policy to reflect changes in our practices, the law or the Platform. Material changes will be communicated through the Platform, and the updated Policy will show a revised effective date. Continued use after notice constitutes acceptance of the revised Policy.

14. Contact

- Product: GeoEV
- Studio: Tumblehill Labs, a division of Tumblehill Holdings
- Email: info@geoatm.app
- Website: evhome.geoatm.app

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