

# PRIVACY POLICY FOR CHARGE-AMPS

## 1. GENERAL INFORMATION

- 1.1 This Privacy Policy is applicable when you sign up for and use the cloud service “my.charge.space” or mobile application connected to the HALO Wallbox (hereafter referred to as the “**Website**” and the “**App**”, respectively, and collectively as the “**Services**”). The Services are provided by Charge-Amps AB, company registration number 556897-7192, having its registered address at Gustav III:s Boulevard 42, 169 73 Solna, Sweden (“**Charge-Amp**”, “**we**” or “**us**”). This document contains information about Charge-Amp’s collection, use and processing of Personal Data (“**Privacy Policy**”).
- 1.2 “**Personal Data**” means information which is directly, or indirectly, referable to a natural living person, e.g. name, address, location data or IP addresses.

## 2. PROCESSED DATA

- 2.1 The following Personal Data is processed when we provide the Services to you:

**Account information:** your name;

your telephone number; and

your email address.

**Technical information:** The dynamic IP-address of the connected HALO Wallbox (which is determined at the time the HALO Wallbox establishes a network connection); and

RFID tag information, so that the HALO Wallbox may recognise what is connected to it.

- 2.2 Unless you provide us with the account information above, we are unable to set up an account for the Services for you. You will not be able to use the Services without setting up an account.

## 3. PURPOSES OF PROCESSING

- 3.1 We will process the Personal Data set out above for the following purposes and based on the following legal grounds:

**Fulfilment of contract** (a) to set up and administrate your account;

(b) to enable and provide the Services;

(c) to ensure the technical functioning of the Services;

**Legitimate interest** (d) to ensure that all communication from the HALO Wallbox comes from the same IP-address; and

(e) to administrate access to and logging of use of the HALO Wallbox (RFID tag).

## **4. LEGAL GROUNDS**

- 4.1 Fulfilment of contract: By agreeing to the Terms of Use in order to use the Services, you enter into an agreement with us under which we shall provide the Services to you. When doing so, we process your Personal Data for the purposes in 3.1 (a), (b) and (c) above.
- 4.2 Legitimate interest: It is a legitimate interest of ours to provide Services that are safe, reliable and well-functioning. We cannot do this without processing your Personal Data for the purposes in 3.1 (d) and (e) that are described above.
- 4.3 Our legitimate interest can be pursued in accordance with applicable laws and there is no less intrusive way of achieving the same result. From our documentation of the Services, it is transparent what Personal Data concerning you is processed, how it is processed, and why it is processed. The Personal Data is handled only by personnel who are bound to secrecy, and it is protected by appropriate technical and organisational measures. The Personal Data provided by you is handled with care and professionalism. Since it is also in your interest to make use of the Services, and our processing of Personal Data does not constitute a significant intrusion of your privacy, rights or freedoms, we base our processing of Personal Data relating to you on the grounds of our legitimate interests.
- 4.4 If you object to the processing of your Personal Data that is processed based on our legitimate interest, we will cease to process your Personal Data for these purposes if we have not been able to provide you with sufficient support for our processing.

## **5. DISCLOSURE OF PERSONAL DATA**

Since the Services are hosted using Microsoft Azure, provided by Microsoft Ireland Operations Limited (“Microsoft” for short), we share and disclose your Personal Data to Microsoft in order for Microsoft to provide us with its services. This makes Microsoft a Personal Data Processor to us. We are responsible for Microsoft’s processing of the Personal Data you have provided us with for the purposes described above. Under the terms of our agreement with Microsoft, Microsoft may not share or disclose the Personal Data relating to you to any third party. Microsoft’s servers which are hosting the Services are located in Ireland.

## **6. RETENTION**

- 6.1 We store your Personal Data for the duration of providing the Services. Upon termination of your account, the Personal Data relating to you will be erased without undue delay. If you have not actively used the Services for a period of 24 months, your account will be terminated, and Personal Data relating to you will be deleted.
- 6.2 We may access, preserve and share your Personal Data in response to a legal request (like a search warrant, court order or a subpoena or the like), or when necessary to detect, prevent and address fraud and other illegal activity, to protect ourselves, you and other users.

## **7. YOUR RIGHTS**

- 7.1 You have the right to request access to and information about the processing of your Personal Data, or request that we correct, rectify, complete, erase or restrict the processing of your Personal Data. You have the right to obtain a copy of the Personal Data relating to you that we process.

- 7.2 You have the right to have the processing of your Personal Data restricted if (i) you have contested the accuracy of the Personal Data; (ii) the processing is unlawful and you have requested restriction; (iii) we no longer need your Personal Data for the original purposes but we require it to establish, exercise or defend legal rights; or (iv) if a verification of overriding grounds, regarding an erasure request, is pending. You also have the right to data portability, meaning that you in some cases can receive the Personal Data that you have provided to us, in a structured, commonly used and machine-readable format, and have the right to transfer such data to another data controllers.
- 7.3 Your rights as a data subject will be accommodated by us to the extent we are obliged under applicable laws.

## **8. CONTACT INFORMATION**

- 8.1 To exercise your rights, or if you have any questions about our processing of your Personal Data, please contact us at the following address: [privacy@charge-amps.com](mailto:privacy@charge-amps.com) or at our postal address set out above.
- 8.2 If you have any complaints regarding our processing of your Personal Data, you may file a complaint to the competent Data Protection authority. You can find out more about the local data protection authorities under the following link [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

## **9. NOTICE OF CHANGES TO THE PRIVACY POLICY**

If we make changes to this Privacy Policy, we will notify you thereof. If your consent is required due to the changes, we will provide you additional prominent notice as appropriate under the circumstances and, ask for your consent in accordance with applicable law.

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