

## CaCharge's Privacy Policy

Latest updated: 2022-04-27

### 1. ABOUT CACHARGE'S PRIVACY POLICY

CaCharge conducts business in several countries. In this privacy policy (the "Privacy Policy"), "CaCharge", "we" and "us" refer to the local group company which provides CaCharge's services (the "Services"). In this Privacy Policy, it is explained which categories of personal data CaCharge collects, why CaCharge collects such data, and what CaCharge uses the personal data for in connection with the Services, CaCharge's mobile application (the "Application") or CaCharge's website (the "Website"). This for you to be able to exercise your rights.

CaCharge processes and handles personal data in accordance with applicable data protection law. CaCharge is the data controller for the processing of your personal data unless otherwise is stated in this Privacy Policy. Personal data is all such information which may be used to identify a specific individual (a natural person).

### 2. WHEN DOES CACHARGE COLLECT INFORMATION??

The personal data which may be processed consists primarily of such data which you, directly or indirectly, provide to CaCharge. CaCharge collects your personal data for example when you via our Service, Website or in other ways:

- a) register as administrator for a Client or for a Charging right owner,
- b) register as User of CaCharge Services,
- c) use the Services, the Application or the Website, or
- d) contact CaCharge.

Data can also be collected from the Client or Charging right owner, for whom you are administrator or who you have a charging services agreement with.

We may also collect personal data from information service providers to cross-check our customers register with public registers to ensure that we have updated and correct information. The data we collect from the public registers is also used by us in connection with communication and offers sent to you.

### 3. PURPOSES OF THE PROCESSING OF PERSONAL DATA

In this section we describe CaCharge's purposes for processing your personal data, which data which is processed and the legal basis CaCharge has for the processing.

Purpose: For those employed by or acting for an entity with a registered account with CaCharge, as administrator, Charging right holder or User.

Personal data	Legal basis for the processing
Identification Data, e.g. name, vehicle registration number	<p>Legitimate interest.</p> <p>The processing of personal data is necessary in order for CaCharge to fulfil its obligations to you in accordance with the terms of the Services and to charge the fees agreed for the Services.</p> <p>If you are invoiced, your personal identification numbers are processed in order to ensure a secure identification of you.</p>
Contact details, e.g. address, email, phone number	
Charging data, e.g. start- and stop time for charging and location of where your vehicle is charged.	
Energy consumption data per charging occasion	
Technical data, e.g. what unit is used	
Location data, e.g. where you are during a certain time period	
<p>Storage period: The data is processed for this purpose during the customer relationship and for a time period of 36 months or, if you are a business customer, 10 years thereafter in order to satisfy CaCharge's legitimate interest of defending, establishing or exercising any legal claims.</p> <p>When the customer relationship ends, the personal data is stored for a maximum time of 23 months thereafter in order to satisfy CaCharge's legitimate interest to fulfill the agreement with relevant Client.</p>	

Purpose: Handle requests from you

Data	Legal basis for the processing
Identification Data, e.g. name, vehicle registration number, client or charging right holder	<p>Legitimate interest.</p> <p>The processing of personal data is necessary in order to satisfy CaCharge's legitimate interest to handle your requests and provide sufficient customer service.</p>
Contact details, e.g. address, email, phone number	
Charging data, e.g. start- and stop time for charging, location of where your vehicle is charged.	
Technical data, e.g. what unit is used	
Transaction data, e.g. paid fee for charging and fees for the Services	
Financial information, e.g. bank account number	
Location data, e.g. where you are during a certain time period	
Communication, e.g. data regarding your questions and our answer.	
<p>Storage period: The personal data is retained for this purpose during a period of six (6) months calculated from the time of the communication. Personal data regarding contacts with you are stored during the customer relationship and during a time period of 36 months or, if you are a business customer, 10 years thereafter in order to satisfy CaCharge's legitimate interest of defending, establishing or exercising any legal claims.</p>	

Purpose: Fulfil legal obligations

Data	Legal basis for the processing
Identification Data, e.g. name, vehicle registration number	Legal obligation. The processing of personal data is necessary in order for CaCharge to fulfil its legal obligations according to law or other regulations.
Contact details, e.g. address, e-mail, phone number	
Charging data, e.g. start- and stop time for charging, location of where your vehicle is charged.	
Technical data, e.g. what unit is used	
Transaction data, e.g. paid fee for charging and fees for the Services	
Communication, e.g. data regarding your questions and our answer.	
Storage period: The personal data is stored for such period as is necessary in order to comply with each legal obligation	

Purpose: Establish, exercise and defend legal claims

Data	Legal basis for the processing
Identification Data, e.g. name, vehicle registration number	Legitimate interest. The processing of personal data is necessary in order satisfy CaCharge's legitimate interest to establish, exercise and defend legal claims. Personal identification numbers are processed in order to ensure a secure identification of you.
Contact details, e.g. address, e-mail, phone number	
Charging data, e.g. start- and stop time for charging, location of where your vehicle is charged.	
Technical data, e.g. what unit is used	
Transaction data, e.g. paid fee for charging and fees for the Services	
Location data, e.g. where you are during a certain time period	
Communication, e.g. data regarding your questions and our answer.	
Storage period: The personal data is retained for this purpose for as long as is needed to establish, exercise or defend the legal claim.	

#### **4. YOUR RIGHTS**

According to applicable data protection legislation, you have a number of rights relating to the processing of your personal data. CaCharge processes your personal data to the extent it is necessary to fulfil your rights. You exercise your rights by contacting CaCharge's customer service. See contact details below.

##### Right to access

You have the right to request to receive a confirmation from us if we process personal data which concern you, and request access to the personal data we process that concern you. Some of the data we store about you are available by logging in to your personal account in the Application and on the Website. A copy of your data can be requested through our customer service.

##### Right to rectification

If you believe personal data registered by CaCharge is inaccurate or inadequate you have the right to request that CaCharge corrects the personal data. You can correct some personal data by logging in to your personal account in the Application or on the Website.

##### Right to oppose to direct marketing

You have the right to, at any time, oppose to CaCharge processing of your personal data in terms of direct marketing and unregister from future marketing communications by contacting customer service.

##### Oppose processing based on our legitimate interest

You have the right to oppose processing based on our legitimate interest for reasons relating to your particular situation. We may continue to process your personal data, even if you have opposed to the processing, if we have compelling legitimate grounds for the processing which overrides your privacy interest.

##### Right to erasure ("the right to be forgotten")

Under some circumstances, you have the right to have your personal data erased, e.g. if you have opposed to the processing and CaCharge doesn't have any compelling legitimate grounds for the processing to continue processing the data. This does not apply if we, for example, are required under law to store the data.

##### Request restriction of processing

Under certain circumstances, you have the right to request restriction of the processing of your personal data. If you request restriction, CaCharge may not be able to fulfil its obligations to you during the period the processing of your personal data is restricted.

## Data portability

Finally, you have the right to receive a copy of the personal data concerning you in a structured format and, if technically feasible, transfer the data to someone else (data portability). The right to data portability, compared to the right to access, only includes data which you have provided yourself and which we process based on certain legal grounds, e.g. the agreement with you.

## 5. SECURITY

CaCharge takes the issue of security of your personal data very seriously. CaCharge implements appropriate technical and organisational measures to protect your personal data from unauthorised access, alteration or destruction. Access to information is limited in various ways (e.g. by user authorisation and passwords being required, which are only assigned to employees who need access to such information to be able to perform their work duties). Other security measures include encryption, firewalls and physical limitations and restrictions when accessing buildings and files.

## 6. TRANSFER OF PERSONAL DATA TO OTHER RECIPIENTS ETC.

CaCharge shares personal data collected with the following recipients for the following purposes. The receiver is the data controller for its own processing of the personal data we share with them, unless otherwise is stated below.

### 6.1 Customers

We share data with Customers in order for them to be able to verify charging carried out in their installations.

### 6.2 Payment receiver and payment service provider

If payment is made through invoice or by credit card, personal data is shared with providers of payment services and, in some cases, with collection agencies in order to fulfil our obligations to you in accordance with the terms and conditions of the Services with invoicing as payment method.

### 6.3 Service provider

In order to fulfil the purpose of the processing of your personal data, CaCharge can share personal data with service providers. These service providers provide, among other, the following services to CaCharge: information services, phone services (PSMS), support services and IT-services, such as marketing, support, operation, improvement, development and services for handling mailings. These service providers are only allowed to process your personal data in accordance with CaCharge's explicit instructions and cannot use your data for their own purposes. They are also obliged to protect your data according to law and agreements.

#### 6.4 Other recipients

Recipient	Purpose	Legal basis for the transfer
Public authorities	We share your personal data with authorities to comply with legal obligations.	The processing is necessary to fulfil legal obligations.
Courts, external advisors and counterparties	In case of a dispute, we may transfer data to other parties.	The processing is necessary in order to satisfy our legitimate interest to establish, exercise and defend legal claims.
Law enforcement agencies, e.g. the Police	We may share personal data with law enforcement agencies, e.g. the Police if we have a legal obligation to share your personal data or in order to contribute to an ongoing criminal investigation.	The processing is necessary in order to fulfil legal obligations or satisfy our legitimate interest to contribute to an ongoing criminal investigation upon request.
Potential buyers and sellers	We may share information with potential buyers and sellers if we would transfer all or parts of our business or conduct a merger.	The processing is necessary in order to satisfy our legitimate interest to carry out an acquisition or merger.

#### 7. WHERE IS MY PERSONAL DATA STORED?

To the extent CaCharge processes your personal data the data is stored on servers within the EU. Our service providers are in some cases located outside the EU/EEA. In order to ensure that your personal data is secure, CaCharge makes sure that appropriate safeguards are in place, e.g. data protection agreements which require that the receiver protects your personal data to the same extent as CaCharge.

#### 8. COOKIES

CaCharge uses cookies to optimise the Services, to perform statistic evaluations, for analyses, and for marketing. A cookie is a text file stored on, e.g., your computer or mobile device, which enables identification of your computer or mobile phone. Cookies help CaCharge to adjust, e.g., the Application and the Website based on your requests as a user of CaCharge's Services, see further information in our cookie policy.

#### 9. AMENDMENTS TO CACHARGE'S PRIVACY POLICY

CaCharge may amend the Privacy Policy from time to time. If any amendments are made to CaCharge's Privacy Policy which imply any amendment to the way CaCharge processes your personal data, e.g. collecting additional personal data for the stated purposes or processing of

data for new purposes, CaCharge will inform you of such amendments via, e.g., the Website, the Application or by email. CaCharge recommends that you regularly read CaCharge's Privacy Policy for the most recent information on how CaCharge processes your personal data.

## **10. CONTACT INFORMATION**

Should you have questions or comments regarding CaCharge's Privacy Policy, please contact CaCharge's customer service. Telephone number: +46 (0) 8 223377 E-mail: [privacy@CaCharge.se](mailto:privacy@CaCharge.se).