



DATA PROTECTION

Privacy Notice – Customers, Business Customers, Suppliers and Business Partners

This Policy sets out what personal data we collect, for what purposes and your rights in this respect

What does this Privacy Notice cover?

This Privacy Notice provides information regarding the processing of your personal data by or on behalf ubitricity Gesellschaft für verteilte Energiesysteme mbH ("ubitricity" or "we") whether as:

- (i) a Direct Access (Pay-As-You-Go) customer;
- (ii) a SmartCable customer;
- (iii) as Customer Experience Survey Participant
- (iv) as a visitor to a ubitricity website ('Website' or 'ubitricity Website');
- (v) as a newsletter subscriber, job applicant or in any other direct interaction.

This Privacy Notice explains **what** personal data are processed about you, **why** we are processing your personal data and for which purposes, **how long** we hold your personal data for, **how to access and update** your personal data, as well as the options you have regarding your personal data and **where to go for further information**.

If personal data of children is gathered this requires consent of the parent or guardian.

Special Notice - if you are under 16 years old. Processing children's personal data

We do not intentionally collect personal data of individuals under 16 years old. If you are under 16 years old please do not send us your personal data for example, your name, address and email address. If you wish to contact ubitricity in a way which requires you to submit your personal data (such as for education or innovation events) please get your parent or guardian to do so on your behalf.



This section describes the different sources from which we collect your personal data.

What personal data do we process about you? Collection of information

We collect information, including personal data about you, as a ubitricityDirect Access (Pay-As-You-Go) customer, as SmartCable Customer, as Customer Experience Survey Participant, as visitor to a ubitricity website and as newsletter subscriber, job applicant or in any other direct interaction with you. This information may be either:

- Information that you provide to us throughout your purchase of ubitricity products, registration for ubitricity services, participation in our surveys and customer support inquiries.
- Information that we obtain through your use of ubitricity services
- Information gathered through social media pages

Direct Access (Pay-As-You-Go) Customer

Direct Access Customer means any person who uses or registers to use the Direct Access (Pay-As-You-Go) service at a Direct Access compatible charge point operated by ubitricity. If you register to use Direct Access charging, ubitricity will gather your e-mail address, charging data (e.g. Charged kWh and charge point ID), payment and billing data (e.g. credit or debit card number with expiration date and security code, purchase amount, date of purchase) and information you provide in relation to Customer Support Inquiries.

We use authorized payment service third party service providers who adhere to PCI DSS requirements.

SmartCable Customer

SmartCable Customer means any person who is purchasing or using a ubitricity SmartCable or ubitricity charge point, concluding a mobile electricity contracts or reimbursement agreement with ubitricity or receiving access to the SmartCable Customer Portal.

Provision of SmartCable, related mobile electricity contract and charge point: For the provision of the SmartCable, conclusion of the related mobile electricity contract, charge point and the installation, commissioning and, if applicable, maintenance, we process the following of your data: First and last name including title, customer address, billing and shipping address, payment data, address of the place of installation, e-mail address, telephone number, customer portal and ubitricity App Login data (login name, password).



Set up of charge point and reimbursement agreement: For setting up a charge point, which is installed behind a metered electricity connection (e.g. house electricity meter) and concluding a reimbursement agreement with the holder of the household electricity contract we process the following of your data: Meter number, tariff information electricity contract, first and last name including title, address, telephone number and e-mail address of the connection user, bank details, Value added tax ID, if applicable.

Billing and reimbursements: For billing and reimbursement purposes vis-à-vis network operators, connection users (e.g. contract holders of the household electricity contract in their own households) and the employer (in the case of company car charging processes), the intelligent charging cable (SmartCable) collects the following data for each charging process at a system socket: Start and end time of the charging process, meter reading at the start and end of charging, 15-minute register values, the identifier of the SmartCable used and the system socket used, the electronic signature of the charge data record. For charging processes at system sockets of ubitricity in public areas (e.g. charging at street lamps), the intelligent charging cable (SmartCable) collects the following data: Start and end time of the charging process, meter reading at the start and end of the charging process, 15-minute register values, the identifier of the Intelligent Charging Cable used and the system socket used, the electronic signature of the charging data record. After completion of each charging process, the SmartCable transmits the measurement data to ubitricity via mobile communications. If a connection cannot be established, the Smart Charging Cable stores the measurement data and transmits it as soon as a connection can be established.

Customer Experience Survey Participant

ubitricity may ask its customers or interested persons to participate in customer experience surveys. If you consent and participate, ubitricity will process your e-mail address, survey answers (such as contact details, charge data, customer satisfaction), charging data (kWh, location, time, and duration of charging event) and data of previous charging events, which were ordered with the given e-mail address as Direct Access Customer or as SmartCable Customer Account.

Visitor to a ubitricity website

Information on your devices and website visits: When you visit our websites data is automatically collected by the technology platforms providing the experience. For example, your web browser or mobile device may share certain data with ubitricity as those devices interact with our website. This data includes device ID, network access,



cookies, ip-addresses, referrer headers, data identifying your web browser, operating system and version and web beacons and tags.

Customer Portals: SmartCable customers can view some of their consumption and customer data in an ubitricity web portal (e.g. <https://portal.mobilstrom.de> or <https://portal.ubitricity.co.uk/home>) in order to be able to use the full range of functions of the SmartCable. For this purpose, we create an individual customer account for you and process your charging, billing and contact data.

Newsletter subscriber, job applicants and any other direct interaction

Newsletter subscription: You have the option to subscribe to our newsletter, in which we keep you informed about new products and activities. For the subscription to our newsletter, we use the double opt-in procedure. We use standard market technologies in our newsletters to measure and process data on interactions with the newsletters (e.g. opening of the email, links clicked on). You can unsubscribe from the list anytime by using the respective unsubscribe link below every newsletter. Contacting us via mail or letter to the addresses given in the newsletter is of course also possible.

Job applications: You can apply to us for open positions. We collect the following data in particular for the purpose of receiving and processing your application: First name and surname, e-mail address, application documents (e.g. references, CV), date of earliest possible start of employment and salary expectations, as well as all other information that you provide to us in your application documents. Applications for our London office are also processed by ubitricity Distributed Energy Systems UK Ltd, a UK subsidiary of ubitricity G.f.v.E. mbH.

Business data: If you are a business customer, supplier, business partner or stakeholder ubitricity will process your private contact information (such as name, postal or e-mail address, and phone number) only if necessary. ubitricity will also process your business contact and other information (such as job title, department, name of organization and your dealings with ubitricity on behalf of yourself or the relevant business customer, supplier, business partner and/or stakeholder).

Direct interaction: If you contact us by phone or email, we will collect the data you provide us with. Emails will be stored in our databases. Information provided and related to a follow up action from our end will also be stored in our databases.



We only process your personal data where we have a lawful basis to do so.

Screening

In addition, in order to comply with legal and regulatory obligations, to protect ubitricity's and its affiliates' assets and employees/contractors and specifically to ensure that ubitricity and its affiliates can comply with trade control, anti-money laundering and/or bribery and corruption laws and other regulatory requirements, we carry out screening (pre-contract and on a periodic basis post-contract) on customers. This screening takes place against publicly available or government issued sanctions lists and media sources.

The screening does not involve profiling or automated decision making in relation to our customers.

Why do we process your personal data?

The personal data covered by this Privacy Notice are only processed:

- where it is necessary to conclude a transaction with you (such as payment information);
- where it is necessary for the purposes of the legitimate interests pursued by ubitricity its affiliates or government/public bodies who award ubitricity the right to operate Charge Points, except where such interests are overridden by your interests or fundamental rights and freedoms;
- where it is necessary for ubitricity to comply with a legal obligation; or
- With your explicit consent

Where the processing is based on consent, you have the right to withdraw your consent at any time. This will not affect the validity of the processing prior to the withdrawal of consent.

What are the consequences of not providing your personal data?

Where you choose not to provide us with information set out above for the purposes of using ubitricity products and services the only consequence is that it will affect your ability to fully interact with the ubitricity products and services.



Who is responsible for any personal data collected?

ubitricity Gesellschaft für verteilte Energiesysteme mbH, a German limited liability company, registered with the Commercial Court Charlottenburg under no. HRB 113 258 B, with offices located at EUREF-Campus 7-8, 10829 Berlin, Germany, will be responsible for processing your personal data, either solely or jointly with its affiliates within the Shell group of companies.

For what purposes do we process your personal data?

We process your personal data for the purposes of:

- Concluding and executing agreements with you, which includes billing and reimbursements and informing you on functionalities or features related to the products and/or services you use;
- providing our products and delivering our services to you, your employer and third reimbursement recipients;
- managing relationships and marketing such as maintaining and promoting contact with you;
- account management including account verification (that is, ensuring that only you or someone you have authorized can access your account and information);
- customer service, development and improvement of our products and services;
- performance of and analysis of customer experience surveys and marketing strategies;
- promotions and contests offered to ubitricity customers, including offering you digital rewards to recognise you as a valued customer; or
- Financial management, asset management, mergers, de mergers, acquisitions and divestitures, implementation of controls, management reporting, analysis, internal audits and investigations; or
- Evaluating your job application and potentially offering you a position
- Legal and/or regulatory compliance including compliance with legal or regulatory requirements including litigation and defence of claims; or
- Health, safety and security including protection of an individual's life or health, occupational health and safety, protection of ubitricity and staff, authentication of individual status and access rights; or detecting or preventing fraud if you use a mobile payment function to purchase ubitricity products and services (if available in your market);



or for a secondary purpose where it is closely related, such as:

- storing, deleting or anonymising personal data;
- fraud prevention, audits, investigations, dispute resolution or insurance purposes, litigation and defence of claims; or
- statistical, historical or scientific research; or
- providing reports and data to government agencies in charge of charge points or responsible for operating and managing charging point schemes; research and policy purposes to reduce carbon emissions; improving air quality and reducing congestions such as the impact of EV-charging on the grid; informing the development of the scheme or a new scheme; transferring the service to a different charge point provider; compliance and regulation duties; reporting on the scheme; and marketing of other government and mayoral programmes

Communication and marketing

If you have consented to receive communications from ubitricity (or if you have previously purchased goods/and or services from us and permitted by local law), you may receive offers that are tailored towards your preferences based on the information gathered about you from the various sources described above in order to provide you with better products and increasingly tailored services.

We may send you service updates and notifications without your advance consent only where such updates and/or notifications are necessary for the proper functioning of the ubitricity Apps or other services that you use.

You may receive pertinent offers and communications by different channels and you may update your subscription preferences via your personal profile settings anytime or use the unsubscribe functionality for the different digital channels.

Transaction security and preventing, detecting and investigating fraud

When you use a mobile payment application to purchase ubitricity products, you may be asked to provide additional personal details to complete the transaction. We may use the personal data you provide to prevent, detect and investigate fraud and to enforce the terms and conditions of the mobile payment application.

We may share some information with the service providers involved in mobile payments (such as stripe), including but not limited to your IP address, device ID or unique identifier, loyalty card number for the purposes detailed above as well as for



Your rights and how to exercise them.

the purposes of collecting points, device type, geo-location information, connection information (for e.g. wi-fi) and mobile network information.

Your rights in relation to your personal data

We aim to keep our information as accurate as possible. You can request:

- access to your personal data;
- correction or deletion of the personal data (but only where it is no longer required for a legitimate business purpose such as completing a retail transaction);
- that you no longer receive marketing communications;
- that the processing of your personal data is restricted; and/or
- that you receive personal data that you have provided to ubitricity, in a structured, digital form to be transmitted to another party, if this is technically feasible.

To make any of these requests, please contact dataprotection@ubitricity.com

Who can you contact if you have a query, concern or complaint about your personal data?

If you have any issues, queries or complaints regarding the processing of your personal data, please contact us at dataprotection@ubitricity.com for further information or for submitting such requests.

You may also contact the Shell Group Chief Privacy Office at Shell International B.V. The Hague, The Netherlands - Trade Register No. 27155369 Correspondence: PO Box 162, 2501 AN, The Hague, at privacy-office-SI@shell.com.

If you are unsatisfied with the handling of your personal data by Shell, then you have the right to lodge a complaint with the German Federal Data Protection Commissioner or the German States Data Protection Commissioners responsible for you or the Dutch Data Protection Authority whose address is Prins Clauslaan 60, 2595 AJ The Hague, The Netherlands. Please visit <https://autoriteitpersoonsgegevens.nl/en> or https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html for more information.



We use cookies on our websites to provide you with the best user experience possible.

Cookies and similar technologies

ubitricity uses cookies and similar technologies that collect and store information when you visit a ubitricity Website or use a ubitricity App. This is to enable ubitricity to identify your internet browser and collect data on your use of our website, which pages you visit, the duration of your visits and identify these when you return so that we improve your experience when visiting our website(s).

In the following, the tools we use are listed by category, whereby we inform you in particular about the tools, the storage period of the cookies. We also explain in which cases we obtain your voluntary consent to use the tools and how you can revoke this consent.

Obtaining and withdrawing your consent: To obtain and manage your consents, we use a Cookie consent tool. This generates a banner which informs you about the data processing on our websites and gives you the opportunity to agree to all, individual or no data processing by optional tools. This banner will appear the first time you visit our website and when you revisit your preferences selection to change them or withdraw consent. The banner will also appear on subsequent visits to our website if you have disabled the storage of cookies or the cookie has been deleted or has expired.

When you visit our website, the cookie consent tool receives your consent or revocation, your IP address, information about your browser, your terminal device and the time of your visit. The cookie consent tool also uses a necessary cookie to store your consents and revocations. If you delete your cookies, we will ask you for your consent again when you visit the site at a later date.

You can withdraw your consent for certain tools at any time. To do so, click on the following link/button: [link/button]. There you can also change the selection of the tools you wish to consent to using, as well as obtain additional information on the cookies and the respective storage period.

Necessary tools and cookies: We use certain tools to enable the basic functions of our website ("Necessary Tools"). Without these tools we would not be able to provide our service. Therefore, necessary Tools are used with-out consent on the basis of our legitimate interests.

Our own cookies: We use our own cookies in particular: for login authentication, for load balancing, to save your language settings, to record that information placed on



our website has been displayed to you -- so that it is not displayed again the next time you visit the website.

Analysis tools and cookies: In order to improve our website, we use tools for the statistical collection and analysis of general usage behaviour based on access data ("analysis tools"). We also use analysis services to evaluate the use of our various marketing channels.

Google Analytics: Our website uses Google Analytics, a web analytics service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). According to Google, the contact for all data protection issues is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

Google Analytics uses cookies and similar technologies to analyse and improve our website based on your user behaviour. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. The data generated in this context may be transferred by Google to a server in the USA for analysis and stored there.

We have made the following data protection settings for Google Analytics:

- IP anonymisation (shortening of the IP address before evaluation so that no conclusions can be drawn about your identity).
- Automatic deletion of old logs / limitation of the storage period to 24 months
- Deactivated advertising function (including target group remarketing through GA Audience)
- Disabled personalised ads
- Disabled Measurement Protocol
- Disabled cross-site tracking (Google signals)
- Disabled data sharing with other Google products and services

The following data is processed by Google Analytics:

- Anonymised IP address;
- Referrer URL (previously visited page);
- Pages viewed (date, time, URL, title, time spent);
- Downloaded files;
- Clicked links to other websites;
- Achievement of specific goals (conversions), if applicable;
- Technical information: Operating system; Browser type, version and language; Device type, brand, model and resolution;



- Approximate location (country and city, if applicable, based on anonymised IP address).

Google Analytics sets the following cookies for the stated purpose with the respective storage duration:

- "_ga" for 2 years and "_gid" for 24 hours (both to recognise and distinguish website visitors by a user ID);
- "_gat" for 1 minute (to reduce requests to Google servers);
- "IDE" for 13 months (third-party cookie to recognise and distinguish website visitors by a user ID, to record interaction with advertising and in the context of playing out personalised advertising).

We have concluded a Data Processing Agreement with Google for the use of Google Analytics as well as standard contractual clauses in the event that personal data is transferred to the USA or other third countries.

You can find more information on this in [Google's privacy policy](#).

Youtube-Videos: We have integrated videos into our website that are stored on YouTube and can be played from our websites if you have consented to this. YouTube is a multimedia service provided by YouTube LLC, 901 Cherry Ave, San Bruno, CA 94066, USA ("YouTube"), a subsidiary of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google").

We have activated YouTube's extended data protection mode. This means that Google does not receive any usage information or set any cookies until the user actively clicks on the play button. After this click, the video is played and Google sets its own cookies to improve its services and to play individualised advertising in the Google advertising network.

By visiting our website, YouTube and Google receive the information that you have accessed the corresponding sub-page of our website. This takes place regardless of whether you are logged in to YouTube or Google or not. YouTube and Google use this data for the purposes of advertising, market research and the needs-based design of their websites. If you call up YouTube on our website while you are logged into your YouTube or Google profile, YouTube and Google can also link this event to the respective profiles. If you do not wish the association, it is necessary that you log out of Google before calling up our website.



In addition to revoking your consent, you also have the option of deactivating personalized advertising in [Google's advertising settings](#). In this case, Google will only display non-individualised advertising.

You can find more information in [Google's privacy policy](#), which also applies to YouTube.

VIMEO Videos: We have integrated videos into our website that are stored on the video platform Vimeo and can be played from our websites if you have consented to this. Vimeo is a multimedia service of Vimeo Inc, 555 West 18th Street, New York 10011, USA ("Vimeo").

When you visit our websites, Vimeo receives the information that you have accessed the corresponding sub-page. This can occur regardless of whether you are logged in to Vimeo or not.

Vimeo may use this data for the purposes of advertising, market research and customising its websites. If you access videos on our websites while you are logged into your Vimeo profile, Vimeo may also link this event to your Vimeo profile. If you do not wish this association, you must log out of Vimeo before accessing our websites.

In the event that personal data is transferred to the USA or other third countries, we have concluded standard contractual clauses with Vimeo.

You can find more information in the [Vimeo privacy policy](#).

Google Maps: Our website uses the map service Google Maps, which is provided for users from the European Economic Area and Switzerland by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland and for all other users by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google").

In order for the Google map material used by us to be integrated and displayed in your web browser, your web browser must establish a connection to a Google server, which may also be located in the USA, when you call up the respective part of the websites. This provides Google with the information that the respective part of the website was called up from the IP address of your device.

If you call up the Google map service on our website while you are logged into your Google profile, Google may also link this event to your Google profile. If you do not wish to be associated with your Google profile, you must log out of Google before accessing our contact page. Google stores your data and uses it for the purposes of advertising,



ubitricity is committed to safeguarding your personal data.

Who do we share your personal data with?

market research and personalised presentation of Google Maps. You can object to this data collection vis-à-vis Google.

You can find more information on this in [Google's privacy policy](#) and the [additional terms of use](#) for Google Maps.

Security of your personal data

We have implemented technology and policies with the objective of protecting your privacy from unauthorised access and improper use. In particular, we may use encryption for some of our services, we apply authentication and verification process for access to ubitricity services and we regularly test, assess and evaluate the effectiveness of our security measures.

Who will we share your personal data with?

Your personal data are exclusively processed for the purposes referred to above and will only be shared on a strict need to know basis with:

- Other companies within the Shell group of companies, for internal administrative purposes, corporate strategy, auditing and monitoring, sanctions screening and research and development.
- Any company within our group of companies where they provide products and services to us that help us to provide products and services to you as our customer.
- Enquiries from the United Kingdom of Great Britain and Northern Ireland are processed by contact partners of ubitricity Distributed Energy Systems UK Ltd, a subsidiary of ubitricity G.f.v.E. mbH.
- Your employer in case of company car charging processes.
- Reimbursement recipients (e.g. holder of household electricity contract).
- Authorized third party agents, licensees, service providers, external auditors and/or subcontractors of ubitricity; or
- A competent public authority, government, regulatory or fiscal agency where it is necessary to comply with a legal or regulatory obligation to which ubitricity is subject to or as permitted by applicable local law.
- Any person to whom ubitricity proposes to transfer any of its rights and/or duties.



Your personal data may be transferred outside of your country, subject to appropriate safeguards.

Transfers of your personal data to other countries

Where your personal data have been transferred to companies within the Shell group and/or to authorized third parties located outside of your country we take organizational, contractual and legal measures to ensure that your personal data are exclusively processed for the purposes mentioned above and that adequate levels of protection have been implemented in order to safeguard your personal data.

Interacting with ubitricity through social media

If you choose to interact with ubitricity through social media on a ubitricity administered social media page ('ubitricity Social Media Page') such as Facebook, Instagram, Twitter or LinkedIn, your personal data (such as your name, your profile picture and the fact that you are interested in ubitricity) will be visible to all visitors of your personal webpage depending on your privacy settings on the relevant social media platform, and will also be visible to ubitricity. You can delete any information that you share on these sites at any time through your relevant social media platform's account. ubitricity does not track your activity across the different social media sites that you use. Please contact ubitricity if you wish to make a request that you are unable to action yourself and which relates to a ubitricity Social Media Page – please see the section 'Your rights in relation to your personal data'].

Additionally and to the extent ubitricity is jointly responsible with a social media platform of a ubitricity Social Media Page, ubitricity will have access through the social media platform to aggregated data providing statistics and insights that help to understand the types of actions you take on ubitricity Social Media Pages. For more information on how your personal data are processed on those social media platforms, including any targeted advertising that you may receive, please refer to your privacy settings accessible through your relevant social media platform's account.

ubitricity will only hold your personal data for a defined period of time.

How long do we hold your personal data for?

Personal data processed by ubitricity in line with this Privacy Notice will be deleted or rendered anonymous (such that it will no longer be possible to identify you) three years after you cease being a customer.



In relation to financial transactions (including those made through a ubitricity App), your personal data will be held for 10 years from the transaction.

In all cases information may be held for (a) a longer period of time where there is a lawful reason to do so (in which case it will be deleted once no longer required for the lawful purpose) or (b) a shorter period where the individual objects to the processing of their personal data and there is no longer a legitimate business purpose to retain it.

Changes to this Privacy Notice

This Privacy Notice is updated periodically. This Privacy Notice was last updated on April 22nd 2021.