



## DATA PROTECTION

### Privacy Notice – Customers

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 of ubitricity Distributed Energy Systems UK Limited (“ubitricity” or “we”) a member of the Shell group of companies (‘Shell’) whether as:

- (i) a Direct Access (Pay-As-You-Go / Ad-hoc) customer;
- (ii) a SmartCable customer;
- (iii) as Customer Experience Survey or Charge Point Location Request Participant ; or
- (v) as a newsletter subscriber 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**

Except in those cases where ubitricity organizes educational events specifically designed for children, 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 ubitricity Direct Access (Pay-As-You-Go / Ad-hoc) customer, as SmartCable Customer, as Customer Experience Survey or Charge Point Location Request Participant and as newsletter subscriber 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 and services, 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/ Ad-hoc) Customer**

Direct Access Customer means any person who uses or registers to use the Direct Access (Pay-As-You-Go / Ad-hoc) 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 receiving access to the SmartCable Customer Portal. If you are a SmartCable Customer ubitricity may process your telephone and fax numbers, billing and shipping address, payment data (e.g. credit or debit card number with expiration date and security code, purchase amount, date of purchase), charging data (e.g. Charged kWh, time and charge point ID), customer portal and ubitricity App user data (language settings, time zone, location of browser), contract data, any information you provide in relation to Customer Support Inquiries or your principle interest in the SmartCable and related services.



### **Customer Experience Survey Participant**

ubitricity may ask its customers or interested persons to participate in customer experience surveys or charge point location request forms. If you consent and participate, ubitricity will process your e-mail address, survey answers (such as contact details, charge data, customer satisfaction, requested charge point location), 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.

### **Newsletter subscriber and any other direct interaction**

You have the option to subscribe to our newsletter and to consent to receiving individualised advertising and information on our products (Direct Marketing). Within the Newsletter and the individualised advertising we inform on our products and activities. For the subscription to our newsletter and consent to Direct Marketing, 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 newsletter mailing list anytime by using the respective unsubscribe link below every newsletter. In the case of individualized contact, you can revoke your consent to the sender directly by responding to the e-mail. Contacting us via mail or letter to the addresses given in the newsletter is of course also possible.

**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.

### **ubitricity and Shells View of the Customer**

With the aim of ensuring you have a seamless experience with the Shell group and depending upon the nature of your engagement with ubitricity and Shell, we combine information gathered from the sources referred to above to create a personal profile of you. This enables you to interact with different Shell companies more easily and ensures we have the most up to date information about you in order to better develop services and products and to tailor offers relevant to your specific interests.

Please note however, you can control how ubitricity and Shell uses this information. You can opt out of having your personal data combined in this way. For further details please refer to section 'Your rights in relation to your personal data'.



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, owners, shareholders and directors of our Business Customers, Suppliers and Business Partners. 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 Chare 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 Distributed Energy Systems UK Limited, a private company limited by shares (Limited Company (Ltd.)) under the laws of the United Kingdom, registered with the Companies House under no. 11393390, with business address at Spectrum House, Unit 11, 32-34 Gordon House Rd, Gospel Oak, London NW5 1LP, United Kingdom 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;
- 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
- detecting or preventing fraud;
- Financial management, asset management, mergers, de mergers, acquisitions and divestitures, implementation of controls, management reporting, analysis, internal audits and investigations; or
- Legal and/or regulatory compliance including compliance with legal or regulatory requirements including litigation and defense 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 programs

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



Your rights and how to exercise them.

### 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.co.uk](mailto:dataprotection@ubitricity.co.uk)

### 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.co.uk](mailto:dataprotection@ubitricity.co.uk) 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](mailto: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 your local data protection authority The Information Commissioner's Office (ICO) whose address is Wycliffe House, Water Ln, Wilmslow SK9 5AF, UK or the Dutch Data Protection Authority whose address is Prins Clauslaan 60, 2595 AJ The Hague, The Netherlands. Please visit <https://autoriteitpersoonsgegevens.nl/en> for more information.



We use cookies.

### **Cookies and similar technologies**

ubitricity uses cookies and similar technologies. For more information, please refer to the ubitricity Cookie Policy at <https://www.ubitricity.com/en/privacy-policy/>.

ubitricity is committed to safeguarding your personal data.

### **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 do we share your personal data with?

### **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.
- 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

### **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





country,  
subject to  
appropriate  
safeguards.

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.

### **How long do we hold your personal data for?**

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

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 may be changed over time. You are advised to regularly review this Privacy Notice for possible changes. This Privacy Notice was last updated April 24<sup>th</sup> 2023.