

# Privacy notice – Recharge Infra

In our updated privacy notice, you can read more on how we treat your personal data. This, together with any other documents referred to within, sets out the basis on which we will process any personal data that we collect from you, or that you provide to us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

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## The data controller

For the purpose of the EU General Data Protection Regulation 2016 ("GDPR"), the data controller is Fortum Recharge AS, Rådmann Siras Vei 1, 1712 Grålum, Norway (herein after "Recharge").

## **How does Recharge process your personal data?**

### **What kind of data does Recharge collect?**

Recharge collects data that is necessary for the relationship you have with us and the purposes for which the data are used. Recharge collects the following personal data categories.

- Permission data - such as marketing permissions;
- Security data - such as passwords, security incident information;
- Financial data - such as payment card details;
- Identifying data - such as name;
- Behavioral data - such as customer profiling and other information derived from your use of our services;
- Communications - such as your answers to surveys, and other feedback and communications you send us;
- Data on your use of our services - such as energy / electricity consumption data;
- Computer device data - such as IP address, cookie data;
- Contact data - such as email address, telephone number,;
- Contract data - such as payment terms.

### **What sources are the personal data obtained from?**

The processed personal data include data that are received from you at the time of the order, at the time of joining our service, or during the customer relationship. We also receive observed data from your use of our devices and services. Recharge may also process derived data which have been derived from or concluded based on the received data.

In addition, we use Google Analytics to track and analyze user online behavior.

### **What are the purposes for processing personal data?**

We process personal data only for predefined purposes. The purposes for which we process personal data are:

- Customer relationship management (e.g sending of contract related notifications, product or service related notifications or updates, customer guidance)
- Contract and product management
- Providing, managing and maintaining the service (e.g. end-user license management, investigating and fixing technical issues)
- Identification of data subjects
- Suspension of provided services
- Receipt and transaction information storing
- Contract archiving
- Delivering goods and services, including returns' management
- Complaint and Dispute management, including compensation demands
- Transferring personal data (to include transfers and disclosures)
- Profiling, segmentation, and direct marketing (for existing and prospective customers)
- Sales and Marketing (including e.g. organizing seminars)
- Billing and debt collection
- Refunds of payments to customers
- Internal reporting
- Establishment, exercise or defense of legal claims

- Partner reporting
- Product and Service development, including feedback and surveys
- Customer satisfaction surveys
- Vendor communications
- Fraud protection

### **On what legal basis do we process your personal data?**

In order for us to be able to process your personal data, we rely on different legal bases, including:

- Your consent. If we rely on your consent as a legal basis for processing of your data, you may withdraw your consent at any time;
- The necessity to establish a contractual relationship with you and to perform our contractual obligations;
- The necessity for us to comply with a legal obligation (for instance, we are required by law to store certain data for a specific period of time) and to establish, exercise, or defend Recharge against legal claims;
- The necessity to pursue our legitimate interests, including:
  - Internal reporting
  - Partner reporting
  - Product and service development including feedback and surveys
  - Transferring personal data (to include transfers and disclosures)
  - Compensation demands
  - Customer profiling or segmentation
  - Direct marketing for existing and prospective customers
  - Debt collection
- The necessity to protect the vital interests of any person;

### **Automated decision-making**

We may make decisions about you through automated decision making. Such include e.g. automated checking of the validity of your payment card; automated pattern detection in the use of your payment card to detect, investigate and prevent potential frauds; and automated tracking of your potential debt to Recharge from previous unpaid use of our services.

Our automated decision-making procedures may affect your ability to use our services. We may need to do this either to perform our legal obligations or because it is necessary for entering into, or the performance of, a contract between you and us. We also carry out profiling to provide our customers with better targeted sales and marketing communication.

If we have made a decision about you solely on the basis of an automated process (e.g. through automatic profiling) and that affects your ability to use the services or has another significant effect on you, you can ask to not be subject to such a decision unless we can demonstrate to you that such decision is necessary for entering into, or the performance of, a contract between you and us.

### **How long do we store the personal data?**

Recharge seeks to limit the period for which the personal data are stored to a minimum. Thus, Recharge processes your personal data only to the extent and as long as is necessary to meet the purposes of the data processing.

The specific retention periods may be different depending on the categories of data. As a general rule, your personal data are stored for a period of three (3) years from the end of the last charging session/end of customer relationship. Whereas e.g. information about transactions will be kept for at least five (5) years on legal basis. Also, when using SMS as a payment method, your mobile subscription number, subject to certain conditions (e.g. insufficient prepaid balance or blocked Premium SMS), might be added onto a so-called black list, where we are required to retain your number for at least half a year.

Recharge sets out and regularly re-evaluates data type specific retention periods for the personal data it holds. Once personal data is no longer necessary, Recharge will delete it or anonymize it as soon as possible.

### **Who processes your personal data?**

Principally, we do not sell, trade or license any personal data to third parties. Companies belonging to the Recharge group of companies may process personal data in accordance with existing privacy laws. Personal data may be disclosed to our authorized employees or affiliates to the extent necessary for the purpose of processing. The data will never be available to all employees but to a limited number of authorized persons.

We also use third parties as our data processors to help us develop, deliver and maintain our products and services, and fulfil our other purposes as defined in this privacy notice. When a third party processes personal data on our behalf, we always ensure via contractual arrangements that the processing of personal data is always conducted safely and in accordance with privacy laws and data processing best practices.

List of categories of the third parties processing data (=data processors):

- Service providers, such as printing services, customer service, installation partners
- Sales and marketing partners
- Payment Service Providers
- Cloud Service Providers
- Charger Manufacturers
- Roaming platform providers
- IT service providers and Consultancies (e.g. developers, designers, and testers)
- Service and maintenance partners (e.g. HW repair and maintenance)
- Charger Cloud systems providers
- Invoicing and debt collection service and system providers
- Data hosting system providers
- Warehouse service and management system providers
- Software and tool providers (e.g. for software development, business analytics, sales, marketing, work order management, customer relationship management, online conferencing and communication)
- Operational companies such as the post office or delivery couriers
- Research companies (for e.g. conducting customer satisfaction or product and service development surveys)
- Telecommunications system providers

In addition, personal data may be disclosed to authorities when we are required to do so by law, based on demands made by competent authorities in accordance with existing privacy laws.

## **Does Recharge transfer personal data to third countries?**

Principally, Recharge does not transfer personal data outside the European Union or the European Economic Area (EEA). However, if personal data is transferred outside the EU or the EEA, Recharge uses appropriate safeguards in accordance with existing privacy legislation, such as the standard contractual clauses provided by the European Commission.

When using the Recharge Digital Solution, your payment card information is stored and processed in the United States via Stripe, Inc. Stripe is subscribed to the EU-U.S. Privacy Shield Framework and to the Swiss-U.S. Privacy Shield Framework, which is a policy that describes privacy practices for handling personal data received from the EEA or Switzerland in the United States. You can find more information on Stripe's subscription and on the principles of the Privacy Shield at the below link.

<https://stripe.com/privacy-shield-policy>

## **How does Recharge protect the personal data?**

Recharge fulfils the necessary technical and organizational measures, which ensure and demonstrate that privacy laws are being followed in the processing of personal data.

These measures include the use of Identity and Access Management systems to ensure that only authorized persons have access to personal data, the use of firewalls, IP filtering, multi-factor authentication, pseudonymization of data, encryption of data, detailed instructions and training for personnel on protection of personal data, and careful consideration when selecting our service providers that are involved in the processing of personal data on our behalf.

## **How do we handle personal data from IP addresses, cookies and similar technologies**

### **Cookies used on websites**

Recharge may collect data on the user's devices via cookies and other applicable technologies.

Cookies are data, which the server of the service provider sends to the user's web browser asking the browser to store the data on the user's device and which the server can later request to receive back. In practice, cookies contain a small amount of data, typically a short piece of text. With cookies we can identify and count the browsers visiting our websites, user preferences and other patterns of user behaviour.

The user can block the use of cookies by changing the settings in his or her web browser. Blocking the use of cookies may affect the functionality of our services.

### **Third party access to data collected on Recharge's websites**

Third parties are entities outside of Recharge, such as marketers, advertisement networks and providers of measurement and tracking services. Third parties may process the user's personal data for example when the user visits our websites or uses the services we provide. A third party may then use the user's personal data, for example, to provide the user with targeted advertisements or to compile statistics on the user counts of different websites.

We ensure via contractual arrangements that the third parties comply with existing privacy laws.

### **Location data**

The location data of the user's device may be used to provide services based on the location of the device, if the user has given a clear consent to the processing of location data.

The user has the right to withdraw the consent at any time by changing appropriate settings on their device.

## **What are your rights when it comes to your personal data?**

### **The rights of the user**

You have the right to demand Recharge as a data controller to allow access to your personal data and the right to ask for the correction or deletion of said data. Additionally, if no legal limitations apply, you have the right to restrict the processing, to object to the processing and to request for your personal data to be transferred to another system.

When the processing of personal data has been based on your consent, you have the right to withdraw your consent at any time.

Finally, you have the right to lodge a complaint with the supervisory authority concerning the processing of personal data by Recharge.

### **Blocking of direct marketing**

You always have the right to forbid the processing of your personal data for direct marketing purposes. The prohibition of direct marketing can be expressed by sending an email to [kaja.slettevold.magnussen@partners.fortum.com](mailto:kaja.slettevold.magnussen@partners.fortum.com).

### **Automated decision-making**

If we have made a decision about you solely on the basis of an automated process (e.g. through automatic profiling) and that affects your ability to use the services or has another significant effect on you, you can ask to not be subject to such a decision unless we can demonstrate to you that such decision is necessary for entering into, or the performance of, a contract between you and us.

## **Changes to our privacy notice**

We reserve the right to amend this Privacy Notice.

Any changes to our Privacy Notice will be communicated to our customers mainly through [www.rechargeinfra.com](http://www.rechargeinfra.com).

Amendments may be necessary due to the development of our services or, for example, changes in the relevant laws.

## **Contact**

Questions, comments and requests regarding this privacy notice are welcome and should be addressed as instructed below.

By post at:

Fortum Recharge AS  
Att: Privacy  
Rådmann Siras Vei 1  
N-1712 Grålum  
NORWAY

Or by email at: [kaja.slettevold.magnussen@partners.fortum.com](mailto:kaja.slettevold.magnussen@partners.fortum.com)