

## Easily Charged App - Privacy Policy

Pluginvest values your privacy very highly. We process your personal data carefully and in a manner compliant with privacy legislation, being (i) the Law of 30 July 2018 on the protection of natural persons with regard to the processing of personal data, (ii) the EU Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter called "Privacy Legislation"). Pluginvest is responsible for collecting and processing data via the "Easily Charged" app, which leverages the smart charging platform and mobile application. This privacy statement aims to inform you about how Pluginvest processes and uses your personal data and to inform you of your rights under the European General Data Protection Regulation ("GDPR").

This privacy statement is divided into the following sections:

1. The Purposes of the Personal Data Collected by Pluginvest
2. Your Freedom to Choose Your Smart Charging Services
3. How Your Data is Collected, Processed and Shared
4. Pluginvest's Partners
5. Retaining and Deleting Personal Data
6. Personal Data Necessary for Your Account Settings and Smart Charging Services
7. Specific Personal Data Necessary for Generating Savings on Your Energy Bill
8. Specific Personal Data Necessary for Generating Earnings in Partnership with Your Energy Supplier
9. Specific Personal Data Necessary for Generating Earnings from Grid Balancing Service Providers in Eligible Countries
10. Security Measures to Protect Your Data
11. Cookies
12. Your Rights
13. Data Portability
14. Contact Us
15. Amendments to this Privacy Statement



## 1. The Purposes of the Personal Data Collected by Pluginvest

Pluginvest collects and processes your personal data to deliver smart charging services (hereafter the “Services”). The purposes of the Services are:

- To help you save money on your electricity bill by charging your electric vehicle (EV) during times when the lowest electricity tariffs apply, typically off-peak times.
- Smart analytics purposes in order to enhance the Services and other development, diagnostic, corrective and commercial purposes in connection with Services. Pluginvest warrants that such use shall be subject to appropriate security and privacy precautions.

The legal grounds for these activities are the contract between you and Pluginvest, as set out in the Terms of Use.

Specifically, Pluginvest will process your personal data to:

- Identify and verify its customers in collaboration with its automotive and energy partners.
- Calculate and implement an optimal charging plan for the EV(s) linked to your account.
- Provide proof to its energy partners of the smart charging services delivered, allowing it to claim and process any benefits.
- Calculate any smart charging benefits (both savings and earnings) and provide payouts for any earnings, assuming this is necessary under the contract terms.
- Offer customer support and answer any queries about Pluginvest and its Services.
- Improve our Services by conducting research and development on people's charging patterns and the Services themselves.

## 2. Your Freedom to Choose Your Smart Charging Services

In the Easily Charged app, you are free to choose whether you want to charge your car using Pluginvest smart charging services. You can choose whether you want to generate savings based solely on your energy tariffs. You must provide explicit consent for us to collect and process the necessary personal data related to each service to deliver that service to you.



### 3. How Your Data is Collected, Processed and Shared

Your personal data is collected either directly from you when you provide information manually in the Easily Charged app, indirectly from publicly available sources, or, with your explicit consent, from our partners in the energy and automotive industries.

We ask for your explicit consent in the Easily Charged app for the right to collect and share the data necessary to deliver each smart charging service. Specifically, we ask for data regarding the historical load curve of your home meter for the relevant time period, as well as data to connect your home to the balancing services perimeter of the Balancing Service Providers (BSPs) we partner with. Our usage does not exceed the stipulations of the energy code and regulations of your country of use. In the Easily Charged app, you can decide whether or not to authorize Pluginvest to access the data relevant to each particular service.

### 4. Pluginvest's Partners

In delivering its Services, Pluginvest acts as the Data Processor for those Services. It partners with several companies (Data Sub-processors) to enable the technical and financial operations of the Services. An up-to-date overview of the e-mobility stakeholders we partner with can be found [here](#). These partners include:

- Jedlix BV (Stationsplein 45/ D1.145, 3013 AK Rotterdam) as developer of the Easily Charged App;
- Last Mile Solutions (Zeemanstraat 11, 3016CN Rotterdam, Nederland) as developer of the connected web portal
- EV Manufacturers who have developed connected EV services to enhance the mobility experience of their customers. Our partnership with EV manufacturers allows us to offer our smart charging services.
- Energy Suppliers and the associated Balance Responsible Party (BRP) that your Energy Supplier uses to purchase electricity on the energy market (larger Energy Suppliers also often act as BRPs).
- Balancing Services Providers (BSPs). BSPs, also known as 'aggregators,' combine different electricity sources (large batteries, windmills, etc.) and make them available to the Transmission System Operator (TSO) or Electricity System Operator (ESO) responsible for maintaining the frequency of the high-voltage energy grid in a specific country, province, or state. To maintain a constant balance between total consumption and production levels at high voltage, TSOs and ESOs manage open and regulated markets and mechanisms of grid balancing services. They procure flexible power capacity from BSPs to offset temporary imbalances caused by excess consumption or



production compared with the national or regional volume they had forecasted. Pluginvest and its BSP partners work together to offer the TSO or ESO flexibility when charging your EV, allowing you to earn benefits through smart charging, even when your Energy Supplier is not partnered with Pluginvest.

- **Distribution System Operators (DSOs).** DSOs are responsible for load management and security of the energy grid in your local area. They are also responsible for managing the metering data of your home (for both your energy consumption and/or production). In some countries, DSOs have developed secured data platforms that can be accessed by third-party service providers like Pluginvest with the express consent of the home energy contract owner. In these cases, Pluginvest uses these provisions to automatically collect the meter code for your home's meter (in some countries, this is called the EAN, MPAN, or PDL code). Pluginvest also collects some technical data concerning your energy contract, such as the power subscription of your home, the off-peak periods applicable to your meter, and your historic electric consumption indexes. Pluginvest does this to comply with national open data regulations and to enable the development of new digital energy management services.

## 5. Retaining and Deleting Personal Data

Pluginvest retains your personal data only as long as necessary to fulfill the purpose for which it was collected, including to satisfy any legal, accounting, or reporting requirements.

To determine the appropriate retention period for your personal data, we consider the amount, nature, and sensitivity of the data. We also consider the potential risk of harm from any unauthorized access to or disclosure of your personal data. We take into account the purposes for which we process your data and whether we could achieve those purposes through other means while still meeting legal requirements.

For example, the GPS location of your EV is never stored by Pluginvest, and this information is never shared with any other parties. This information is only used to verify whether the vehicle is at your designated smart charge location.

Details of your payments are kept as long as necessary to comply with legal and regulatory requirements, generally seven years unless the law prescribes a longer period.



## 6. Personal Data Necessary for Your Account Settings and Smart Charging Services

We collect the following data:

- **Identity Data:** This includes your first name, last name, nickname, email address, and an encrypted version of your chosen password.
- **Address Data:** This includes your country, address, postcode, and house number to determine your smart charge location.
- **Profile Data:** This includes the name of your Energy Supplier, the make and model of your EV, your charging preferences and settings in the Easily Charged app, and any information you provide in response to surveys or through customer feedback.
- **Connected Car Account Data:** This includes your Vehicle Identification Number (VIN) and/or your connected car credentials, depending on your EV's make and model. Your credentials are used only once to verify your account with the car manufacturer and retrieve an access token for our Services; they are never stored by us. We also process data required to access the services provided by your car manufacturer needed for smart charging, which you must authorize.
- **EV Data:** This includes information about your vehicle status, the state of charge of your battery, telemetry data, and information about your vehicle's GPS location. We use this to ensure that we only smart charge your EV at the location you designate in the app.
- **Pay-out Data:** This includes your initials and last name, your bank account IBAN, the amount to be paid to you, information about your charging data, and your contract number with your Energy Supplier.
- **Technical Data:** This includes information about your mobile device type and Easily Charged app version, time zone, country of use, browser type and version, operating system, mobile platform, and other technology-related information used to access our Services.
- **Tracking Data:** This includes information collected from cookies and similar tracking technologies, such as web beacons, pixels, and mobile identifiers, to improve our Services.
- **Marketing and Communications Data:** This includes your preferences for receiving marketing from us and our partners.

We share the following data:



- **Connected EV Account Data:** Shared with your EV manufacturer to allow us to connect your EV to the Easily Charged app if eligible for our Services.
- **Payout Data:** Shared with our payment service provider to transfer any earnings to your bank account.
- **Technical Data:** Shared with our service provider to enhance the Easily Charged app performance.
- **Tracking Data:** Shared with our marketing partners to tailor marketing messages to you. However, you have control over this data, and you can adjust your settings to restrict sharing.

## 7. Specific Personal Data Necessary for Generating Savings on Your Energy Bill

To generate savings on your energy bill, Plugininvest collects and processes the following additional personal data:

- **Home Meter Data:** This includes historical load curve data from your home's electricity meter and the applicable energy tariffs. This data is necessary to identify the optimal times to charge your EV to save on your electricity bill.
- **Home Energy Contract Data:** This includes the power subscription of your home and the off-peak periods applicable to your meter. This data is necessary to develop an optimal smart charging plan that aligns with your energy tariff structure.

## 8. Specific Personal Data Necessary for Generating Earnings in Partnership with Your Energy Supplier

To generate earnings from our Energy Supplier partners, Plugininvest collects and processes the following additional personal data:

- **Balance Responsible Party (BRP) Data:** This includes information related to the energy supply contract between you and your Energy Supplier. This data is necessary to verify your eligibility for earnings and calculate the benefits owed to you from smart charging.

## 9. Specific Personal Data Necessary for Generating Earnings from Grid Balancing Service Providers in Eligible Countries

To generate earnings from grid balancing services, Plugininvest collects and processes the following additional personal data:



- **Balancing Services Data:** This includes information related to the flexibility provided to the grid through smart charging of your EV. This data is necessary to provide proof of service to our BSP partners and claim any benefits.

## 10. Security Measures to Protect Your Data

Plugininvest implements appropriate technical and organizational measures to ensure a level of security appropriate to the risk of the data we process. These measures include:

- Encryption of data in transit and at rest.
- Regular security assessments and audits.
- Access control measures to restrict access to personal data to authorized personnel only.
- Secure data storage solutions.

## 11. Cookies

We use cookies and similar tracking technologies to enhance your experience on the Easily Charged app. You can control and manage cookies through your browser settings.

## 12. Your Rights

Under the GDPR, you have the following rights:

- **Right to Access:** You have the right to request access to the personal data we hold about you.
- **Right to Rectification:** You have the right to request that we correct any inaccuracies in your personal data.
- **Right to Erasure:** You have the right to request that we delete your personal data under certain circumstances.
- **Right to Restrict Processing:** You have the right to request that we restrict the processing of your personal data under certain circumstances.
- **Right to Data Portability:** You have the right to receive your personal data in a structured, commonly used, and machine-readable format, and to transmit that data to another controller.
- **Right to Object:** You have the right to object to the processing of your personal data under certain circumstances.

To exercise your rights, please contact us using the contact details provided below.



### 13. Data Portability

You have the right to request that we provide you with a copy of your personal data in a structured, commonly used, and machine-readable format, so that you can transmit that data to another controller.

### 14. Contact Us

If you have any questions about this privacy statement or our data protection practices, or if you wish to exercise your rights under the GDPR, please contact us at:

Pluginvest:

Plantin en Moretuslei 289, 2140 Antwerpen

[operations@pluginvest.eu](mailto:operations@pluginvest.eu)

03 376 85 80

### 15. Amendments to this Privacy Statement

Pluginvest reserves the right to amend this privacy statement at any time. We will notify you of any significant changes by updating the statement on our website and in the Easily Charged app. Your continued use of our Services after any changes to this privacy statement will constitute your acceptance of the changes.

