

# ALFEN PRIVACY STATEMENT FOR DIGITAL APPLICATIONS 2024-I



This Alfen privacy statement for digital applications 2024-I, is used by Alfen ICU B.V., registered with the Dutch Chamber of Commerce under number 64998363, with principal place of business at Hefbrugweg 79, 1332 AM Almere, the Netherlands, hereinafter '**Alfen**'.

## 1. Personal Data

- 1.1 Alfen respects the privacy of its customers, the users of its products and the users of its applications. Alfen treats all personal data in accordance with the applicable rules and regulations in relation to privacy, in particular in alignment with the General Data Protection Regulation (the '**GDPR**').
- 1.2 This privacy statement contains information on how Alfen treats your personal data. In this privacy statement you will find the following information (i) the details of Alfen as the recipient of your personal data, (ii) how Alfen treats your personal data, (iii) how Alfen collects your personal data, (iv) on what grounds and for which purposes Alfen collects your personal data, and (v) how you can exercise your rights in relation to your personal data.

## 2. Controller

- 2.1 This privacy statement specifically applies to the processing of personal data by Alfen in relation to the usage of the Eve Connect application (the '**Application**'). The Application can be downloaded and installed on your mobile device and can be connected to the Alfen charging station (the '**Product**'), in order to be able to make better and easier use of the Product. The party responsible for the processing of personal data as a result of the usage of the Application is Alfen.
- 2.2 Should you have any questions (i) with respect to this privacy statement, (ii) on how Alfen processes your personal data, or (iii) on how to exercise your rights in relation to your personal data, you can contact Alfen via [privacy@alfen.com](mailto:privacy@alfen.com). You can also reach out to Alfen by sending a letter to Alfen ICU B.V., c/o 'Privacy', Hefbrugweg 79, 1332 AM, Almere, the Netherlands.

## 3. Purposes and Personal Data

- 3.1 Alfen collects your personal data if and when you use the Application. Based on the usage of the Application, a user profile is created. You do not need to share any contact details with Alfen to be able to use the Application. Alfen bases your user profile on the Product number.
- 3.2 You can use the Application to control the Product, to change the Product's power settings, to switch between different Product modes and charging modes, to look at

the charging history, to turn solar charging on and off, etc.

- 3.3 Alfen collects your personal data in order to provide you with a better Product experience. Alfen further collects your personal data in order to be able to ensure a good user experience of the Application.
  - 3.4 Alfen collects and processes the following (personal) data from you:
    - 3.4.1 the Product number, the place, country and time zone the Product is placed in;
    - 3.4.2 if and when the Product is being used, how the Product is being used, how often the Product is being used, the maximum power of the Product, which Product modus is being used and which Product features are being used;
    - 3.4.3 the device you use to download the Application, the operating system of the device, when and how often the Application is being used and which version of the Application is being used.
  - 3.5 The aforementioned (personal) data is collected and processed either (i) based on your consent, (ii) in order for Alfen to perform its obligations under an agreement concluded with you, or (iii) to pursue the legitimate interests of Alfen.
- ## 4. Recipients of your Personal Data
- 4.1 Alfen can share your personal data with third parties with whom you have requested we share your personal data in order to facilitate certain application connections and with our Alfen after sales department in case you have any specific questions in relation to the Product.
  - 4.2 Third parties that assist Alfen with respect to the Application (such as hosting parties or parties providing data analysis) may have access to your personal data. Only in the event that it is crucial for the execution of their services on behalf of Alfen will these third parties be granted access to your personal data. Third parties with whom Alfen shares your personal data are explicitly forbidden to use the personal data for purposes that are not in conformity with the agreement between Alfen and the third party in question.
  - 4.3 In the future, one or more parts or assets of Alfen may be transferred to a third party or Alfen may merge with a third party. In that case, your personal data may be transferred to this third party.
  - 4.4 Alfen may use third-party services to process your data in

accordance with this privacy statement. These parties may be based outside the European Economic Area (the 'EEA'). Your personal data will only be stored or processed by Alfen or by engaged third parties outside the EEA if this is in accordance with the applicable laws for the transfer of personal data to countries outside the EEA. Therefore, Alfen will only transfer your personal data to countries outside the EEA if the European Commission has decided that the third country in question ensures an adequate level of protection, or if other appropriate safeguards are in place.

## 5. Your Rights

- 5.1 This privacy statement is primarily meant to inform you as comprehensively as possible of the manner in which Alfen processes your personal data. Alfen however fully understands that you may have additional questions or require clarification on a particular aspect of this privacy statement. Should you have any questions, you can contact Alfen via the contact details stated in Clause 2.2.
- 5.2 In addition, you can use the aforementioned contact information to exercise any of the following rights:
  - 5.2.1 the right to view your personal data or request a copy thereof and/or have your data amended if it is found to be incorrect or incomplete;
  - 5.2.2 the right to withdraw your consent if we have requested your consent for a certain type of processing;
  - 5.2.3 the right to restrict the processing of your personal data or object to the processing of your personal data;
  - 5.2.4 the right to have your personal data deleted;
  - 5.2.5 the right to data portability;
  - 5.2.6 the right to object to processing.
- 5.3 When submitting a request to Alfen, Alfen can ask you to reveal your identity in order to ascertain if the request is legitimate.
- 5.4 Alfen may refuse your request if compliance therewith would violate the privacy rights of other persons, breach any trade or company secrets, or if it puts intellectual property rights at risk. Should your personal data be required to comply with an agreement or legal obligation, it is possible that Alfen may not (yet) alter or delete such personal data.
- 5.5 You are entitled to submit a complaint to the personal data authority (the '*Autoriteit Persoonsgegevens*').

## 6. Retention Period

- 6.1 Alfen stores your personal data for as long as necessary to facilitate the purpose for which it has been collected.
- 6.2 In exceptional cases, personal data will be retained for a longer period in connection with legal obligations.

## 7. Technical and organisational measures

- 7.1 Alfen values the careful handling of your personal data. Alfen takes all appropriate technical and organisational

measures to ensure your personal data is protected and secured, primarily against loss, unauthorised changes or unlawful access.

- 7.2 In the design of the application, Alfen has taken into account that only personal data that is necessary for Alfen to fulfil the objective of the application, is collected. Alfen restricts the access within its organisation to individuals who need to have access to the personal data in order to be able to fulfil their employment obligations. Those individuals have been informed as to the confidentiality of the personal data, are subject to confidentiality obligations and have been instructed to handle such personal data accordingly.
- 7.3 Should you end up on third-party websites via the Alfen application, Alfen highly recommends that you review the privacy statements of these third-party websites. Alfen is not responsible for the compliance with privacy laws by third parties.

## 8. Amendments

- 8.1 Alfen reserves the right to amend this privacy statement as a result of changes in the Application, changes in applicable law, changes in the interpretation of applicable law and changes in the business processes or company policies of Alfen. From the moment of the amendment of this privacy statement, the new privacy statement becomes effective automatically and replaces the previous version of the privacy statement. Alfen therefore advises you to take frequent notice of this privacy statement, as amendments can be issued at any time.

## 9. Applicable Law

- 9.1 This privacy statement and the use of the application are subject to the laws of the Netherlands, excluding its conflict of laws provisions. Any issues arising out of or in connection with this privacy statement, the use of the application or in any other matter between you and Alfen shall be subject to the exclusive jurisdiction of the District Court 'Midden Nederland', location Almere, the Netherlands.