IVOchargers privacy statement

Updated on 22 March 2021

IVOchargers takes your privacy very seriously and shall carefully process and use information obtained from you or about you.

IVOchargers

IVOchargers has its main offices in Belgrade, Serbia at Milutina Bojica 8 and is registered with the Serbian company agency under number 20969741. IVOchargers has appointed a Data Protection Officer who has been registered with the Data Protection Authority. The Data Protection Officer can be reached via <u>help@ivochargers.com</u>

What information do IVOchargers collect and process?

Providing personal data upon registration

If you want to fast charge your electric vehicle you can register with IVOchargers by creating an IVOchargers account. You can create your IVOchargers account through the IVOchargers app. When creating your IVOchargers account, you will be asked to provide certain personal data such as name, telephone number, e-mail address, and/or address and/or bank or charge card information (optional). All these data are stored and processed by IVOchargers within the European Union or by companies located inside or outside the European Union. We take organizational, contractual and legal measures to ensure that the personal data is exclusively processed for the purposes mentioned in this privacy statement and that adequate levels of protection have been implemented in order to safeguard the personal data.

To make full use of the IVOchargers App functionality, it is recommended to switch on the IVOchargers App location service. This allows the use of GPS data and locations of WiFi hotspots and telephone masts to determine your approximate location, in order to assess which IVOchargers fast-charge station is closest to you. IVOchargers may store and process these data regarding locations to improve our services. We may also ask you for access to your camera when you want to share a photo, for example when you want to send us feedback. We will always ask you for specific access to your location service or your camera and you may refuse this at all times. Sharing location services is therefore not mandatory, but it is convenient.

You may always modify the above-mentioned data yourself in your IVOchargers account or ask us to modify or delete your data. IVOchargers shall store personal data for no longer than is necessary for the realization of the purposes for which they are collected and processed.

Do you prefer not to provide us with your personal data? You can also charge at IVOchargers without registering; in this case, you pay for a one-off charging session with a credit or debit card, or with your charge card. Please see the paragraph Payment for more information.

Communication

If you have registered with IVOchargers, IVOchargers may send you messages in various ways, for example via email, via text messages, and via push notifications within the App. We use email or push notifications to keep you informed of new relevant developments regarding IVOchargers (like the opening of new stations), maintenance of our network, and important information about your charging session. The text message service and/or the email may be used for verification for your account or for sharing important information regarding your charging session or account.

Payment

Payment by debit or credit card with an IVOchargers account for payment for a charging session as a registered IVOchargers user we need certain personal data such as your name and your debit or credit card number, which are required for your payment. We shall supply this data to our payment service provider Stripe. The personal data required depending on the payment method selected. IVOchargers only processes the last four digits of your IBAN number or your credit card number and expiry date. IVOchargers shall only supply the payment service provider Stripe with the data necessary for payment execution.

One-off payment by debit- or credit card without registration

It is also possible to pay for a one-off charging session without registration or an account. For these payments, your credit, debit, or bank account information (such as expiry date and type of card) and other financial information required for your payment will be collected and stored by our payment service provider Stripe. IVOchargers does not process any personal data.

One-off payment by a payment terminal

For payment for a one-off charging session, you can also pay via a payment terminal. For these payments, your debit or credit card number, the expiry date, and type of card will be collected and stored by our payment service provider. IVOchargers only process your card number.

Payment by charge card

When using a charge card, the costs incurred will be invoiced via the charge card company. IVOchargers receive a so-called RFID code from the charge card company that issued your charge card, on the basis of which IVOchargers can send an invoice to the charge card company for the electricity charged.

Automatically generated information

IVOchargers also collects automatically generated information about your behavior while using the service, including but not limited to how often you use the service, the type of vehicle, your charging behavior and the specific location. This information includes for example your IP address and the type of device used for Authorisation. We may also use cookies, as described below. We shall never categorize these data.

Camera surveillance

For your own safety, to monitor our belongings, prevention, and registration of nuisance, vandalism, and other criminal offenses, IVOchargers has implemented camera surveillance at its charging stations. The camera surveillance is announced on notice boards at the boundaries of the areas covered by the cameras, because the cameras are prominently displayed, and, if necessary, in other clearly visible ways. IVOchargers shall never store the images longer than necessary and/or legally allowed.

Job applicants

If you respond to a vacancy on our Website, we ask for your details, including your resume. We use these details to evaluate your application and possibly to contact you. We use a third-party (software) applicant tracking system for the processing of responses to our vacancies on our Website. We will keep your personal data only for the period necessary to fulfill the purposes for which it was collected or processed unless we have to keep it for tax or legal reasons. In practice, this means that if you are hired, the information related to your job application will end up in your personnel file. If you are not hired, we will keep your personal data until four weeks after you've been rejected, unless you provide consent for us to keep it for a longer time, which will never be more than twenty-four months.

What are cookies and how do IVOchargers use them?

When you use the IVOchargers App and the Website, IVOchargers uses cookies that are stored temporarily ("session" cookies) or for a longer period of time ("persistent" cookies) by your browser and/or the IVOchargers App on the device you use. Cookies are small files that contain information sent by the server of IVOchargers and/or third parties to your browser for the information to be sent back to the server of IVOchargers and/or the third party concerned during a subsequent visit. IVOchargers only uses cookies to perform and improve its services.

For which purposes shall IVOchargers use the collected information?

- IVOchargers shall use the personal data collected from you for the following purposes:
- To provide you with the best possible service;
- To facilitate and optimize your use of our fast charge services;
- To handle your complaints, suggestions, and questions;
- To draw up anonymized statistical data based on automatically generated information;
- To keep you informed of developments at IVOchargers;
- To send you push messages, emails, and/or other types of messages when we think this may improve our service to you, but only if you authorize us to do so;

• To provide your data to third parties if this is useful for our services and always within the limits of laws and regulations;

- To process your payment transactions;
- To evaluate your application and possibly to contact you.

Use by IVOchargers and grounds for the processing

IVOchargers uses and processes your personal data to ensure easy use of our services, proper handling of possible complaints/suggestions/questions, and ensure payments can be made for the fast charge services provided.

IVOchargers also wants to keep you informed of the developments within its network; we consider this an informative service. We think it is useful for customers to be aware of new stations, maintenance to our network, and other important news regarding IVOchargers. We shall not send you any commercial offers via e-mail without your permission. If you no longer wish to receive this information, you may unsubscribe by clicking the "unsubscribe" link at the bottom of the e-mail.

The legal ground for processing your personal data is based on your personal consent. You may revoke your consent at any time by deleting your account or by asking us to remove your account. If you do not want us to register you can also charge with us without registration, by means of a

separate charging session via a charge card or by paying for a separate charging session by credit card or debit card. If a charge card is used, we shall only process your personal RFID code that is linked to your charge card. We receive this RFID code from the party that has provided you with your charge card. This is based on the legal ground that processing of this code is required for executing the agreement. After all, you purchase electricity from us and you need to pay for this by using your charge card, credit card, or debit card.

In the event you apply for a job with us, the legal ground for processing is based on your personal consent by applying for a job. You may revoke your permission by sending an email to help@ivochargers.com In that case we will not process your application and remove your data from our applicant tracking system.

Use by third parties

IVOchargers may provide personal data to third parties for the purposes of providing their service. IVOchargers has its own platform for providing and using your IVOchargers account and authorization of your account. Mailchimp helps us send your emails in a more easy way. When you call IVOchargers Customer Service, your telephone number will appear in a call center. If our Customer Service does not answer, but your call is answered by a staff member, our external customer support center, this staff member can also see your personal data. And finally, we use Google Analytics and Crazy Egg to better analyze the use of our service and we use Firebase for push messages. Google Analytics is user-friendly, which means that we use Google Analytics cookies but we cannot see the last part of your IP address, your data will not be shared and we do not use the Google Analytics cookies for other Google services. IVOchargers has concluded data processing agreements with the aforementioned parties to guarantee the careful processing of personal data. IVOchargers expands rapidly and we do our best to keep this list up to date. In case of any questions, please do not hesitate to contact us.

IVOchargers shall not provide your personal data to third parties for direct marketing purposes (for example for mailing of advertising materials) without your explicit consent.

Personal data are only disclosed to the judicial authorities upon receipt of a legal order from a public prosecutor to that end, or if there is another legal obligation for IVOchargers to do so. If personal data show evidence of criminal offenses, IVOchargers may decide to officially report this and voluntarily hand the personal data over to the competent authorities as evidence. In exceptional cases, IVOchargers may decide to provide private third-party access to personal data. This requires balancing the interests of the private party for inspection, and the interests of the data subject, like his/her right to protection of privacy. If possible and if IVOchargers so wishes, this shall be done in consultation with the data subject.

Protection of personal data

IVOchargers has implemented appropriate technical and organizational measures to protect your personal data against loss or any form of unlawful processing. The external companies engaged by IVOchargers have taken appropriate measures to secure the processed personal data against unauthorized access or misuse. Space, where the personal data is stored, is physically protected from unauthorized access (key, pass, etc.). Where possible, data are stored in such a way that they cannot be traced back to natural persons, and as such cannot be regarded as personal data. Records are also kept (logging) of who requests personal data and when. This logging is regularly monitored. The persons authorized to access personal data are explicitly bound by confidentiality. Access to personal data is password protected.

Transfer of business

In the future, one or more parts or assets of IVOchargers may be transferred to a third party or IVOchargers may merge with a third party. In that case, your personal data may also be transferred.

Access to and correction and deletion of your data

If you wish to receive more information about the processing or if you want to know what data IVOchargers has recorded on you, please contact help@ivochargers.com. IVOchargers shall inform you within four weeks if and what personal data IVOchargers processes about you. If this is the case, IVOchargers shall send you a complete overview of the personal data that IVOchargers processes about you and shall indicate the purpose for which these personal data are processed.

Based on the overview provided you may ask IVOchargers, at reasonable intervals, to improve, complete, or to remove (the right to be forgotten) personal data, or to block them if they are factually incorrect, incomplete, or irrelevant to the purpose or purposes of the processing, or otherwise processed in a manner that is contrary to statutory regulation, in as far as you could not personally modify those data via your IVOchargers account.

A person recorded on camera images may access the images on which (s)he is identifiable. To this end, an appointment can be made with IVOchargers. A person recorded on camera images may receive a copy of these images by submitting a request, in writing or by electronic means, to IVOchargers. A request for access or extraction of a copy requires proof of identity and a clear indication of the time period during which the data subject is suspected to have been recorded.

Amendment of the privacy statement

As we may change this statement from time to time, we encourage you to check this page regularly to ensure you are aware of any changes. If we make significant changes to our privacy statement, we will also publish a clear notice on our website. If we wish to use your data for other processing, we will actively inform you of the following

Questions

Should you have any questions regarding this Privacy Statement, please send an e-mail to help@ivochargers.com In case you have a complaint about the processing of personal data, you have the right to lodge a complaint with the Data Protection Authority.