

Paua Privacy Policy

Updated 31st October 2021

Please read this privacy notice carefully to understand when we may collect your personal data, how and why we use it, the legal basis of this use, and your rights with respect to the processing of your personal data.

Who we are

This privacy policy applies to Paua Tech Limited (company number 12145853) whose registered office is at address; 92 Station Road, Clacton On Sea, Essex, CO15 1SG (“Paua”)

If you have any questions, comments, and requests regarding this privacy policy, please contact us at support@pauatech.com

Changes to our Privacy Policy

We reserve the right to amend this Privacy Policy. Amendments may be necessary due to the development of our products and services or, for example, changes in the relevant laws. Any changes to our Privacy Policy will be communicated on our website or through our mobile application. In some cases, we may choose to notify about these changes by email. Any updates will get a a date they were updated.

Why do we collect your personal data?

We process personal data only for predefined purposes. We will process your personal information lawfully, fairly and in a transparent manner. We collect and process information about you only where we have legal bases for doing so. These legal bases depend on the services you use and how you use them, meaning we collect and use your information only where:

- it’s necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract (for example, when we provide a service you request from us);
- it satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote our services, and to protect our legal rights and interests;
- you give us consent to do so for a specific purpose (for example, you might consent to us sending you our newsletter); or
- we need to process your data to comply with a legal obligation.

The purposes for which we process personal data are:

- Providing, managing and maintaining the service (e.g use of our apps and fixing technical issues)
- Customer relationship management (e.g sending of contract related notifications, product or service related notifications or updates, customer guidance)
- Contract and product management

- Identification of data subjects
- Suspension of provided services
- Receipt and transaction information storing
- Contract and invoice 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
- Fleet manager reporting
- Partner reporting
- Product and service development, including feedback and surveys
- Customer satisfaction surveys
- Vendor communications
- To make our website better and more secure
- Fraud protection

What data do we collect?

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

- Permission data - such as marketing permissions;
- Preference data - such as contract type, contact language; payment method; pricing type;
- Security data - such as passwords, security incident information;
- Technical data - such as technical data of customer consumption point;
- Transactional detail data - such as invoicing details;
- Financial data - such as credit card number, bank account information;
- Identifying data - such as name; RFID key number
- Behavioral data - such as customer profiling and other information derived from your use of our services; login details;
- Communications - such as your answers to surveys, ratings, chat messages, and other feedback and communications you send us;
- Data on your use of our service - such as energy / electricity consumption data;
- Computer device data - such as type of device, operating system, IP address, cookie data;
- Personal contact data - such as email address; telephone number; billing address; delivery address;
- Contract data - such as payment terms
- Company data
- Vehicle data - such as make, model, license plate, mileage, state of charge, VIN number, road tax, location and MOT

Sources of personal data?

The processed personal data include data that are received from:

- You, or your nominated representative in the case of business drivers, at the time of joining our service or during the customer relationship
- your use of our devices and services
- process derived data which have been derived from or concluded based on the received data
- when you contact us through the Website, by telephone, post, e-mail or through any other means;
- when you register with us and set up an account to receive our products/services
- when you make payments to us, through this Website or otherwise;
- when you elect to receive marketing communications from us;

We use Google Analytics to track and analyse user online behaviour. To opt out of services like Google Analytics please click on: <http://tools.google.com/dlpage/gaoptout?hl=en-GB>

Cookies

We use cookies to give your device access to core features of our app, to track app usage and performance on your device, to tailor your experience of our app based on your preferences, and to serve advertising to your device. Any communication of cookie data between your device and our servers occurs within a secure environment.

We may use cookies in our website for:

- Authentication – to identify you
- Session ID Status – to determine if you are logged in
- Personalisation - to personalise our website for you
- Security - to protect user accounts and our website
- Advertising – to display relevant advertising

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you. Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

How long do we keep your data for?

Paua will keep your data only for so long as it is necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical analysis, such as looking at email open rates, or to improve our

products and develop new products and services.. In these cases, we may use this information indefinitely without further notice to you.

How does Paua protect personal data?

Paua takes software security seriously and has taken several steps to protect your personal data.

- Paua uses tools to detect risks when coding the applications such as, code injection attacks, cross-site scripting, unvalidated redirects, and violation of data isolation when querying different databases.
- Paua enforces HTTPS/SSL encryption for all our applications and web services.
- Paua's proprietary APIs follow OAuth2 code flows
- Paua implements a role based access only allowing users with specific roles to access their permitted apps, screens or functionality.
- Paua also tracks the details of every access to application screens. These logs include the component and screen accessed, which user accessed it when the access occurred, and exactly which node served the screen.
- Paua logs all access to external systems performed through web services or custom integration logic. Paua also logs all web service requests to applications running inside the Paua platform. The logs keep a record of who made the request, the request's target, the method called, how long the request took, and the exact time of the request. This enables any security issues to be tracked down efficiently.
- Paua uses tools that address and help prevent the threat from the most critical security risks to web and mobile applications as defined per OWASP Top 10 and OWASP Mobile Top 10.

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

Should you become aware of a security vulnerability or bug across any part of our services, we encourage the disclosure such vulnerabilities by emailing apps@pauatech.com

Personal Data Sharing

Principally, we do not sell, trade or license any personal data to third parties. Personal data may be disclosed to our authorised employees or affiliates to the extent necessary for the purpose of processing. On occasion we may use third parties as our data processors to help us develop, deliver and maintain our product 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, installation partners, customer service providers
- Sales and marketing partners including sponsor or promoters of competitions we may run
- Payment Service Providers
- Cloud Service Providers
- Charger Owner or Operators
- 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 (Back office operators)
- Invoicing and debt collection service and system providers
- Data hosting system providers (e.g. AWS, Microsoft Azure)
- Warehouse service and management system providers
- Software and tool providers (e.g. for software development, mapping and geolocation, 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

We may also disclose your personal data to third parties:

- Your personal data may be sent to a third-party debt collection agency in order to collect outstanding payments from you on our behalf. You will be notified before we do this in accordance with our terms and conditions.
- Personal data may be disclosed to authorities when Paua is required to do so by law, based on demands made by competent authorities in accordance with existing privacy laws.
- If we sell or buy any business or assets. We may disclose your personal data to the prospective seller or buyer of such business or assets; or
- if we or substantially all our assets are acquired by a third party, in which case personal data held by it about our customers will be one of the transferred assets.
- Paua may also sell or share anonymised personal data (so that it can no longer be associated with you) or insights derived from anonymised personal data.

Does Paua transfer personal data to third countries?

Principally, Paua 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, Paua uses appropriate safeguards in accordance with existing privacy legislation, such as the standard contractual clauses provided by the European Commission .

What are your rights?

GDPR gives you the users of Paua website, app and services, a number of important rights with which to control the use of your personal information.

Withdraw consent – Where we are using your personal information on the basis of your consent, you have the right to withdraw that consent at any time;

Right to be informed – You have the right to be told how your personal information will be used. This policy document, and shorter summary statements used on our communications, are intended to be a clear and transparent description of how your data may be used;

Right of access – You can write to us asking confirmation as to whether or not your personal data is held by us, and if so, be able to request a copy of that information. This is called a Subject Access Request.

From 25 May 2018 we will have 30 days to respond to you once we are satisfied you have rights to see the requested records and we have successfully confirmed your identity;

Right of erasure – From 25 May 2018, you have the right to be forgotten (i.e. to have your personal data deleted). You have the right to be forgotten, if:

- The data are no longer necessary for the purposes for which they are processed
- You withdraw your consent for some treatment and thereafter there is no legal basis for Paua to process the data
- Your data has been processed illegally
- The processing of your data is not necessary to comply with applicable legal requirements in order to determine, enforce or defend legal claims and/or for archival, research or statistical purposes;

Right of rectification – If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. This enables you to have any incomplete or inaccurate data we hold about you corrected. We may need to verify the accuracy of the new data provided to us;

Right to restrict processing – In certain situations you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage;

Right to data portability – Where we are processing your personal data under your consent, the law allows you to request data portability from us to another service provider. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format;

Right to object – When data processing is carried out on the basis of the legitimate interests pursued by Paua or by a third party, you have the right to object at any time to processing of personal data concerning you. Unless Paua can demonstrate compelling legitimate grounds for the processing, Paua shall no longer process the personal data;

Right to object to direct marketing - You are entitled to object to the processing of personal data pertaining to you for direct marketing at any time. Then we will no longer process personal data for such purposes. This right is implemented by amending your contact preferences either at the bottom of our marketing materials or via the app;

Right to object to automated decisions – In a situation where a data controller is using your personal data in a computerised model or algorithm to make decisions “that have a legal effect on you”, you have the right to object.

Right to complain to the supervisory authority - You are entitled to complain to a Data Inspection Authority or other competent regulatory authority if you believe that we treat your personal data in violation of applicable data protection legislation. However if, for any reason, you have a complaint or want to exercise a right, please contact Paua first to discuss your query. If after having contacted Paua and received a response you are still dissatisfied regarding privacy and data issues, you are able to contact the Information Commissioner’s Office (ICO) directly by phone on 0303 123 1113 or on their [website](#).