

Paua Privacy Policy

Updated 20th April 2022

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”). All references in this notice to “Paua”, “our”, “us” or “we” refer to Paua Tech Limited. All references in this notice to “our website”, refer to the website owned by Paua at www.pauatech.com

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

1) Our Values and what this notice is for

We value your privacy and want to be accountable and fair to you as well as transparent with you in the way that we collect and use your personal information. We also want you to know your rights in relation to your information which you can find below.

In line with these values, this privacy notice tells you what to expect when we collect and use personal information about you. We have tried to make it easy for you to navigate so you can find the information that is most relevant to you and our relationship with you.

We are always looking to improve the information we provide to our customers and contacts so if you have any feedback on this privacy notice, please let us know using our contact details in section (m) - **Further questions and how to make a complaint** below.

2) People who this Policy applies to

- a) Visitors to our website;
- b) Customers, and employees of customers; and
- c) Prospective customers and people who contact us with enquiries

3) What this policy covers

This policy covers the following areas relating to your information:

- a) How we obtain your information;
- b) How we collect your information and how we use it;
- c) Our legal basis for using your personal information;
- d) How and why we share your personal information with others;
- e) Length of time we store your personal information
- f) Your rights
- g) Children
- h) Marketing
- i) Where we may transfer your personal information
- j) Risks and how we keep your personal information secure
- k) Links to other websites
- l) Changes to this privacy policy
- m) Further questions and how to make a complaint

4) Objection Rights

You have various rights to object in respect of our use of your personal information, set out in **section (f) -Your Rights**. The core right we want to highlight to you is that you can ask us to review any valid objections which you may have to our use of your personal information where we process your personal information on the basis of our, or anyone else's legitimate interest. Please review **section (f) -Your Rights** for more information

5) What you need to do and what you confirm to us

Please read this privacy policy closely so that you understand how we use your personal information. By continuing to engage with us as set out in this privacy notice, you confirm you have read and understood this privacy notice in its entirety as it applies to you.

The key information you should be aware of

a) How we obtain your personal information

- 1) You may provide us with your personal information voluntarily. We may also receive information about you from third parties such as market research companies, our suppliers, contractors and consultants at our sites, public websites, public agencies and marketing agencies, which we refer to as "third party sources" or "suppliers" throughout this policy.
- 2) You may give us personal information about yourself by using the online forms provided on our website, setting up an account with us, using bulletin boards or forums on our website, or by contacting us by phone, email or other means. This includes, for example, where you provide your personal information to us in order to receive products, deliveries, information or services from us. If you are a supplier, you may also give us personal information about yourself when you are offering or providing services to us.
- 3) We may also receive information about you from:

- 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 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>

b) The personal information we collect and how we use it

Please refer to the relevant section or sections below that describes your relationship with us to understand what information we collect about you and how we use this information. We refer to this as "personal information" throughout this statement.

A) Visitors to our website

1) What personal information we collect about you

We will collect and use any of the following information about you:

- i.your name, email address, business address and job title;
- ii.information provided when you correspond with us;
- iii.any updates to information provided to us; and
- iv.the following information created and recorded automatically when you visit our website and when registered users access gated content:

A) Technical information. This includes: the Internet Protocol (IP) address used to connect your computer to the internet address; the website address and country from which you access information; browser type and version; browser plug-in types and versions; operating system; and platform. We use this personal information to administer our website, to measure the efficiency of our systems; and

B) Information about your visit and your behaviour on our website (for example, the pages that you click on). This may include the full Uniform Resource Locators (URL) of

the website you visit before and after visiting our website (including date and time), time and length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, traffic data, location data, weblogs and other communication data, information provided when requesting further service or downloads and methods used to browse away from the website.

2) How we use your personal information

- i. We will collect, use and store the personal information listed above for the following reasons:
- ii. to receive enquiries from you through the website about our business;
- iii. for improvement and maintenance of our website and to provide technical support for our website;
- iv. to ensure the security of our website;
- v. to recognise you when you return to our website and to store information about your preferences; and
- vi. to evaluate your visit to the website and prepare reports or compile statistics to understand the type of people who use our website, how they use our website and to make our website more intuitive. Such details will be anonymised as far as reasonably possible and you will not be identifiable from the information collected.

Please see sections D and E4 for more details about how we use your personal information.

3) A word about cookies

- i. Some pages on our website use cookies, which are small files placed on your internet browser when you visit our website. We use cookies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences.
- ii. 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.

- iii. 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
- iv. Where we use cookies on our website, you may block these at any time. To do so, you can activate the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our website or to use all the functionality provided through our website.
- v. For detailed information on the cookies we use and the purposes for which we use them, please refer to our cookies notice.

B) Customers

1. What personal information we collect about you

We may collect and use any of the following information about you:

- i. your name;
- ii. your email address;
- iii. your telephone number;
- iv. information provided when you correspond with us;
- v. any updates to information provided to us;
- vi. Permission data - such as marketing permissions;
- vii. Preference data - such as contract type, contact language; payment method; pricing type;
- viii. Security data - such as passwords, security incident information;

- ix. Technical data - such as technical data of customer consumption point;
- x. Transactional detail data - such as invoicing details;
- xi. Financial data - such as credit card number, bank account information;
- xii. Identifying data - such as name; RFID key number
- xiii. Behavioral data - such as customer profiling and other information derived from your use of our services; login details;
- xiv. Communications - such as your answers to surveys, ratings, chat messages, and other feedback and communications you send us;
- xv. Data on your use of our service - such as energy / electricity consumption data;
- xvi. Computer device data - such as type of device, operating system, IP address, cookie data;
- xvii. Personal contact data - such as email address; telephone number; billing address; delivery address;
- xviii. Contract data - such as payment terms
- xix. Company data
- xx. Vehicle data - such as make, model, license plate, mileage, state of charge, VIN number, road tax, location and MOT and
- xxi. personal information needed to provide the services to you (including information on registration forms).

2. How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- i. to provide you with our website services; and
- ii. to deal with any enquiries or issues you have about our services that you request from us.

Please see sections D and E4 for more details about how we use your personal information.

3. Information we need to provide services to you.

We need certain types of personal information so that we can provide services to you and perform contractual and other legal obligations that we have to you. If you do not

provide us with such personal information, or if you ask us to delete it, you may no longer be able to access our services.

C) People who contact us with enquiries

1. We may collect and use any of the following information about you:

- i. your name including your title;
- ii. your email address;
- iii. your telephone number;
- iv. information provided when you correspond with us;
- v. and any updates to information provided to us.

2. How we use your personal information

We will collect, use and store the personal information listed above to deal with any enquiries or issues you have about our services, including any questions you may have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes.

Please see sections D and E4 for more details about how we use your personal information.

D) Whatever our relationship with you is, we may also collect, use and store your personal information for the following additional reasons:

1. to deal with any enquiries or issues you have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we have a contract with you, we may process your personal information in accordance with our contract. If we do not have a

contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes;

2. for internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and to identify and implement business efficiencies. We may process your personal information for these purposes where it is in our legitimate interests to do so;
3. to comply with any procedures, laws and regulations which apply to us – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so; and
4. to establish, exercise or defend our legal rights – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.

E) Further processing

Before using your personal information for any purposes which fall outside those set out in this section, we will undertake an analysis to establish if our new use of your personal information is compatible with the purposes set out in this section. Please contact us using the details in section (m) - **Further questions and how to make a complaint** if you want further information on the analysis we will undertake.

c) Our legal basis for using your personal information;

1. We consider that the legal bases for using your personal information as set out in this privacy notice are as follows:

- a) our use of your personal information is necessary to perform our obligations under our contract with you (for example, to comply with the terms of use of our website which you accept by accessing our website and to comply with our contract to provide services to you);
- b) you have given your explicit consent (see below); or
- c) where neither (a) nor (b) apply, use of your personal information is necessary for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our website). Our legitimate interests are:
 - i. to operate our website;
 - ii. research and development,
 - iii. to market and promote our services;
 - iv. to protect our legal rights and interests;
 - v. for internal group administrative purposes; and
 - vi. to respond to your correspondence to us.

If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a balancing test to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information. You can ask us for information on this balancing test by using the contact details at section (m) -

Further questions and how to make a complaint

- 2. If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by de-registering from our service on your profile page and we will stop doing so.

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.

d) How and why we share your personal information with others;

1. 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 and services better and more secure
 - Fraud protection
 - if you make enquiries through our site, and agree in the contact form to receiving email updates, we will send you such updates on the grounds of your consent; and
 - to enable third parties (including Paua Partners), if required, to support us in operating our business.
2. Any third parties with whom we share your personal information are limited (by law and by contract) in their ability to use your personal information. We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy notice and applicable laws
3. We will also disclose your personal information to third parties:
- a) where it is in our legitimate interests to do so to run, grow and develop our business if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;
 - b) where such third parties assist us with administering or troubleshooting our website, assist us with our mailing campaigns or provide us with electronic or physical storage services;
 - c) if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
 - d) if we are acquired by another organisation, such parties will have access to your personal data as part of any due diligence or onboarding activities;
 - e) to provide information to our Partners for whom we operate EV charging services;
 - f) in order to enforce or apply our terms of use, our terms and conditions for customers or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or

- g) to protect the rights, property, or safety of Paua, our staff, our customers or other persons.
4. Save as expressly detailed above, we will never share, sell or rent any of your personal information to any third party without notifying you and, where necessary, obtaining your consent. If you have given your consent for us to use your personal information in a particular way, but later change your mind, you should contact us and we will stop doing so.

e) Length of time we store your personal information

1. We keep your personal information for no longer than necessary for the purposes for which the personal information is processed.
2. We hold your personal data for as long as necessary in line with any legislative, regulatory or business need.
3. You have the right to request we erase your data, where we do not have any overriding legal, regulatory or contractual obligations.
4. 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.

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.

f) Your rights

1. You have certain rights in relation to your personal information. If you would like further information in relation to these or would like to exercise any of them, please contact us via email at support@pauatech.com at any time. You have the following rights:
 - a) Right to 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;

- b) 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;
- c) Right of access. You have a right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation as to whether your personal information is being used by us; details about how and why it is being used; and details of the safeguards which are in place if we transfer your information outside of the United Kingdom or the European Economic Area ("EEA").
- d) Right to update your information. You have a right to request an update to any of your personal information which is out of date or incorrect.
- e) Right to delete your information. You have a right to ask us to delete any personal information which we are holding about you in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us using the details in **section (m) - Further questions and how to make a complaints.**

We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are, using the contact details in **section (m) - Further questions and how to make a complaints.**

- f) Right to restrict use of your information: You have a right to ask us to restrict the way that we process your personal information in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us using the details in **section (m) - Further questions and how to make a complaints.**

We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are using the contact details in **section (m) - Further questions and how to make a complaints**

- g) Right to data portability: You have a right to ask us to provide your personal information to a third party provider of services.

This right only applies where we use your personal information on the basis of your consent or performance of a contract; and where our use of your information is carried out by automated means.

- h) Right to object. You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest.

2. We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request unless we tell you we are entitled to a longer period under applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims.
3. If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.

h) Children

1. You must be aged 18 or over to use our services. Our website and services are not directed at children and we do not knowingly collect any personal information from children.
2. If you are a child and we learn that we have inadvertently obtained personal information from you from our websites, or from any other source, then we will delete that information as soon as possible.
3. Please contact us at support@pauatech.com if you are aware that we may have inadvertently collected personal information from a child.

i) Marketing

1. We may collect and use your personal information for undertaking marketing by email telephone and post.
2. We may send you certain marketing communications (including electronic marketing communications) if it is in our legitimate interests to do so for marketing and business development purposes or, if you are a sole trader or a non-limited liability partnership, if you have consented to receive such electronic marketing information.
3. However, we will always obtain your consent to direct marketing communications where we are required to do so by law and if we intend to disclose your personal information to any third party for such marketing.

4. If you wish to stop receiving marketing communications, you can contact us by email at support@pauatech.com.

j) Where we may transfer your personal information

1. Your personal information may be used, stored and/or accessed by staff operating outside the EEA working for us, other members of our group or suppliers. Further details on to whom your personal information may be disclosed are set out in **section d) How and why we share your personal information with others.**
2. Principally, we do not sell, trade or license any personal data to third parties. Personal data may be disclosed to our authorised employees, Partners 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
3. 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 Partners, sponsor or promoters of competitions we may run
 - Payment Service Providers
 - Cloud Service Providers
 - Charge Point 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
4. 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.
5. If we provide any personal information about you to any such non-EEA members of our group or suppliers, we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this privacy notice. These measures may include the following permitted in Articles 45 and 46 of the General Data Protection Regulation:
6. in the case of US based entities, entering into European Commission approved standard contractual arrangements with them, or ensuring they have signed up to the EU-US Privacy Shield (see further <https://www.privacyshield.gov/welcome>); or
7. in the case of entities based in other countries outside the EEA, entering into European Commission approved standard contractual arrangements with them.
8. Further details on the steps we take to protect your personal information, in these cases is available from us on request by contacting us by email at support@pauatech.com at any time.

k) Risks and how we keep your personal information secure

1. The main risk of our processing of your personal information is if it is lost, stolen or misused. This could lead to your personal information being in the hands of someone else who may use it fraudulently or make public, information that you would prefer to keep private.
2. For this reason, Paua is committed to protecting your personal information from loss, theft and misuse. We take all reasonable precautions to safeguard the confidentiality of your personal information, including through use of appropriate organisational and technical measures.
3. In the course of provision of your personal information to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to our website and that any such transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access to it.
4. Where we have given you (or where you have chosen) a password which enables you to access your online account, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
5. 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

l) Links to other websites

Our website may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of such third-party websites or any association with their operators. This privacy notice only applies to the personal information that we collect or which we receive from third party sources, and we cannot be responsible for personal information about you that is collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third party websites or third party terms and conditions or policies.

m) Changes to this 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 to this Privacy Policy will contain a date showing when they were updated.

T

n) Further questions and how to make a complaint

1. If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, please contact support@pauatech.com. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information.
2. In accordance with Article 77 of the General Data Protection Regulation, you may also make a complaint to the Information Commissioner's Office, or the data protection regulator in the country where you usually live or work, or where an alleged infringement of the General Data Protection Regulation has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.