

Privacy Policy Easy Charging

Thank you for using our Easy Charging mobile application ('app'). This information applies to the following services and functions, provided they are available in a country, an app version and depending on the mobile device and vehicle model.

Please find below information on the data controllers and their responsibilities (section A), on how your data is collected, processed and used in conjunction with the use of the app (section B) Charging Services (section C, D and E) and on your rights and points of contact (section F and G).

A, Data Controller, Joint Controllership

If you use the Easy Charging charging service ("Charging Service"), your data is being processed by Volkswagen Group Charging GmbH, Mollstraße 1, 10178 Berlin, email: info@elli.eco, entered in the Commercial Register of the District Court of Charlottenburg under No. HRB 208967 B ('Elli Germany') and Volkswagen Group Charging CZ s.r.o., Ve svahu 482/5, Podolí, 147 00 Praha 4, Czech Republic (which Volkswagen Group Charging GmbH has appointed to provide the charging service within the Czech Republic) ('Elli Czechia') under joint responsibility (joint controllership).

In order to determine their respective responsibilities, Elli Germany and Elli Czechia have concluded an agreement for the joint processing of your personal data in accordance with Article 26, paragraph 1 GDPR. You hereby receive information about the essential content of this agreement.

According to the agreement Elli Germany carries out the processing of personal data in connection with the provision of the Easy Charging in general. Elli Czechia only receives and processes your personal data if you carry out charging sessions within Czech Republic for the purpose of billing, invoicing and charging payments as described in section D II. and III. In the agreement it is also determined that Elli Germany is responsible for providing the information referred to in Articles 13 and 14 GDPR and for processing any assertion of rights by costumers. You find more information on your rights and point of contact in section F and G.

Elli Czechia or Elli Germany are both known as 'Elli' and therefore hereinafter referred to as 'Elli', 'we' or 'us'.

B. General information on using the app

I. General information

Unless you register or otherwise provide us with information, we collect the data described below, which is technically necessary for us to offer you the functions of the App and to ensure the stability and security of the App:

- Operating system;
- Date and time of the request;
- Device type;
- the amount of data transferred in each case.

We process this information to enable a technically functional app (e.g. by adapting the app to the needs of your device type). In addition, this information is processed to optimize the Elli-App and to guarantee the stability and security of the app and our information technology systems. The automatically collected data is not personal related and does not allow any inference to you, it is stored for 30 days and then properly deleted, unless longer storage is required or justified by law.

II. Search and find charging stations and share with Google/Apple maps

If you wish to use the search and find function for charging stations, the Google Maps (Google Inc.) map service is integrated on your device. This map service allows you to view charging stations. If you use this service, once enabled, your location is sent to the map service at the time of your query. Please note that this map service is provided to you by Google under its own responsibility. We are not responsible for data processing by Google. Privacy information for the Google Maps service may be found at <https://policies.google.com/privacy>.

You can also share the charging stations described as above on your device with your own map service available or installed on your device (e.g. Apple Maps, Google Maps etc.). If you use this function, the relevant map service will process your location at the point at which you share it, as well as shared destinations (e.g. an available charging station together with the address). Please note that the map services are provided by the relevant providers respectively under their own responsibility. We are not responsible for data processing. Privacy information for the map service can be found in the privacy policies for the relevant provider, such as for Apple Maps at <https://www.apple.com/legal/internet-services/maps/terms-en.html> or for Google Maps at <https://policies.google.com/privacy>.

If you use one of the two aforementioned services, we will store the corresponding data for technical reasons only temporarily. The legal basis for this data processing is your use of the corresponding services (Article 6, paragraph 1, letter b, GDPR). As soon as you log off, your personal data is deleted. After one year of non-use at the latest, they are deregistered for security reasons and have to register again. In this case too, the temporarily stored data will be deleted.

III. Tracking Tools

Volkswagen Group Charging GmbH uses Microsoft App Center to collect anonymous data on the use of the software for the purpose of improving the software, the components configured with it and the services. Documented are the frequency of use of the software, individual functions, malfunctions of the software, model, version and status information of the component as well as model, operating system, language and country of the device. No personal data will be transmitted to Volkswagen Group Charging GmbH.

IV. Processing of your data for analysis purposes

Purpose of processing • To ensure and improve product quality, research and development of new products and services • To identify and resolve, among other things, technical problems in the service (bugs) • For business planning, process analysis (process mining), internal reporting and forecasting

Categories of personal data for this purpose: • User and usage data • Records of the use of the charging points, showing the individual charging processes of the customer • Wallbox data, its usage and location data as well as information on the software status & software updates, additional data on the software version • All data collected during the charging process • Purchase, shipping and payment information • Customer service processes • Data on the use of the apps and web shops • VIN, which has been shortened by the 6 last digits (identification of the vehicle model)

The data is processed for this purpose exclusively in a pseudonymized or anonymized manner. Pseudonymization includes the removal of all direct personal identifiers (e.g. name, email address, telephone number). Indirect traceable identifiers (pseudonyms) are retained. Only after this pseudonymization is the data analyzed in the analytics systems of Volkswagen Group Charging GmbH. At no time is the direct personal reference restored. The results from the analysis (especially metrics and KPIs) are completely anonymous. The processing of pseudonymous data is

necessary because there are interactions between the user account and the respective services. In these cases, the use of the pseudonym is absolutely necessary in order to correlate the analysis of the underlying data from the user account and the linked services.

V. Data processing within the Google Cloud Platform

Volkswagen Group Charging GmbH uses Google Cloud Platform (GCP) to process the following data categories: • User profile data (e.g. email address, first name, last name, billing address) • Device specific data (e.g. model, language, device location) • Information about charging activities (e.g. charging records, charging sessions) • Wallbox information (e.g. name, location, configuration) • Car information (e.g. model, make, Vehicle identification number) • Authentication media (e.g. RFID cards) • Consent information (e.g. agreement to T&Cs, wallbox firmware updates) • Subscription information • Invoices

This data is collected and used for the purpose of: • Providing different functions of the app • Contract fulfilment • Enabling, improving and further development of charging services

For this we use the data processor Google Ireland Limited ("Google") with its registered office at Gordon House, Barrow Street, Dublin 4, Ireland, which uses Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google LLC") as subprocessor. Appropriate EU standard contractual clauses (as an appropriate guarantee for data processing in non-European countries) have been concluded for the transmission of personal data. You may review the applied EU standard contractual clauses via the URL <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32021D0914>.

VI. Attribution tools

Volkswagen Group Charging GmbH uses analytics platform Adjust for app attribution and optimising the user product experience, as well as scaling the app.

For this purpose we collect and process the following data:

1. Attribution data
2. User IDs generated by us
3. Device specific data (e.g. model, language, device location)
4. Car information (e.g. model, make)
5. Authentication media
6. Information about charging activities (e.g. charging records, charging sessions)
7. Subscription information

The associated data processing is based on your consent (Art. 6 (1) (a) GDPR).

You can withdraw your consent at any time free of charge at Volkswagen Group Charging GmbH. You will find further information on exercising your rights in this data protection declaration in the section "Your rights".

For this we use the data processor Adjust GmbH ("Adjust") with its registered office at Saarbrücker Str. 37a, 10405 Berlin.

VII. Analytics tools

Volkswagen Group Charging GmbH uses analytics platform Amplitude for app analytics, with the purpose of gaining insight into the usage of the app and its functionalities so that we can enhance your experience by introducing improvements or new features tailored to your needs.

For this purpose we collect and process the following data: • App events • Device specific data (e.g. model, language, device location) • Car information (e.g. model, make) • Authentication media • Information about charging activities (e.g. charging records, charging sessions) • Subscription information

The associated data processing is based on your consent (Art. 6 (1) (a) GDPR). You can withdraw your consent at any time free of charge at Volkswagen Group Charging GmbH. You will find further information on exercising your rights in this data protection declaration in the section ""Your rights"".

For this we use the data processor Amplitude, Inc. ("Amplitude") with its registered office at 201 3rd Street, Suite 200, San Francisco, CA 94103. Appropriate EU standard contractual clauses (as an appropriate guarantee for data processing in non-European countries) have been concluded for the transmission of personal data. You may review the applied EU standard contractual clauses via the URL <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32021D0914>.

VIII. Feature management with LaunchDarkly

We use LaunchDarkly feature management platform with the purpose of utilising feature flags in the app. This enables us to selectively enable and test different features in the app and thereby enhance your experience and quality of the app. For this purpose we process user profile data (e.g. email address, user ID, country) and app and device-specific data (e.g. app version, brand, OS).

For this we use the data processor Catamorphic Co. dba LaunchDarkly, provider of the Service ("LaunchDarkly") with its registered office at 1999 Harrison St., Suite 1100, Oakland, CA 94612 USA. Appropriate EU standard contractual clauses (as an appropriate guarantee for data processing in non-European countries) have been concluded for the transmission of personal data. You may review the applied EU standard contractual clauses via the URL <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32021D0914>.

C. Data Processing upon conclusion of the contract

I. SEAT ID / CUPRA ID

To use our service via the App you need either a SEAT ID or CUPRA ID user account provided by SEAT, S.A., Autovía A-2, Km. 585, Martorell (Barcelona, Spain), registered in the Commercial Register of Barcelona edition 23.662, sheet 1, page no. B-56.855 ("SEAT"). Please note the detailed SEAT Privacy Policy applicable for SEAT ID and CUPRA ID. This policy can be viewed at <https://seatid.vwgroup.io/data-privacy>.

When you use our services, we process the information from your SEAT ID or CUPRA ID user account (your personal contact and identification data (such as your name, address and email address)) for the purposes of contractual fulfilment (Article 6, paragraph 1, letter b GDPR) if you agree to such transfer of information.

We use Auth0 (10800 NE 8th Street, Suite 700, Bellevue, WA 98004, U.S.A.) to provide your account and login with your Elli user account. This use includes the storage of personal contact and identification information, such as name, address, and email address. Access to the information by Auth0 cannot be excluded, so a corresponding EU standard contract (adequate

guarantee for data processing in non-European countries) has been concluded. The EU standard contractual clauses used can be accessed via the URL <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021D0914>.

II. Easy Charging (Public Charging)

a. Charging Card provision

To start and end a charging session, you need an RFID Charging Card ('Charging Card'). This is provided by Plasticard-ZFT GmbH & Co. KG, Reisewitzer Straße 82, 01159 Dresden, who acts and processes data on our behalf. Plasticard-ZFT GmbH & Co. KG receives your contact details (first and last name and address) in order to deliver the Charging Card to you. We receive an RFID identifier assigned to your order and the Charging Card number from Plasticard-ZFT GmbH & Co. KG. This allows us to assign the Charging Card to your user account. You have the option to set up an additional delivery address for the Charging Card, which we also provide to Plasticard-ZFT GmbH & Co. KG. The data processing required for this is performed for the purposes of contract fulfilment (Article 6, paragraph 1, letter b, GDPR).

An RFID identifier is stored on the card and is used to assign it to your user account. The Charging Card number is printed on the Charging Card. Beyond that, there is no personal data stored digitally on the Charging Card, particularly not your name or address.

b. Charging Plans, Payment Method

To use our Charging Services you select a charging tariff ('Charging Plan') and your preferred payment method. To conclude a Charging Service contract, we process your first and last name, address, email address and, if you have supplied it, your VAT ID number. You can view and manage your selected plan in your user profile. You can also change your stored payment method and billing address. The data processing is performed for the purposes of contract fulfilment (Article 6, paragraph 1, letter b, GDPR).

c. Data processing for payment purposes

For the processing of the payment, we process the following personal data:

Credit card payment • First and last name • Credit card data (credit card number, CVC code (card verification number) and expiration date) • Credit card address • E-mail address

Paypal • First and last name • Paypal address • Email Address • Payer ID

The payment data is collected by us for transmission to the payment services. In addition, we transmit to the payment services the address and e-mail address you provided to us. The data processing required for this is carried out within the framework of the fulfillment of the contract (Art. 6 Para. 1 lit. b GDPR).

For the purpose of payment processing, we use Volkswagen Payments S.A. at 19-21 route d'Arlon L 8009 Strassen as a payment service provider. Volkswagen Payments S.A. uses your data for a specific purpose within the framework of the payment service and is independently responsible for processing data. When making payments, you are therefore subject to the privacy policy of Volkswagen Payments S.A., which you can view at the following link https://www.wallet.volkswagenpayments.com/documents/file_data_privacy_customer_de-de.pdf.

When you enter your payment data for the first time during your registration for Elli Charging, their validity and authenticity are verified by the payment service. The result of the verification is

sent to us by the payment service as a success or error message. We will inform you about the result in the app. If we need to ask you for further identification on behalf of the issuer of your credit card or Paypal, this may be, for example, an SMS or email code that you receive from the issuer of your credit card or Paypal and enter for authentication either in the app or on a website of the issuer of your credit card or Paypal, to which we redirect you. So that you do not have to re-enter your data for each loading process, your payment data is stored in a payment memory by the payment service provider. If the payment service responsible for processing your payments changes, the data will be transferred from the outgoing payment service to the payment service responsible in the future.

Should a payment default occur, Elli - A Brand of the Volkswagen Group reserves the right to resort to a debt collection service provider on our behalf in order to take over the outstanding debt in a dunning process. For this purpose, it may be necessary to transfer further customer-relevant data to our service provider atriga GmbH. The atriga GmbH uses your data for a specific purpose within the framework of the receivables process and is independently responsible for the processing of the data.

Your personal data will be handled by atriga GmbH in accordance with the applicable data protection regulations. You can also find more information about this at <https://www.atriga.com/datenschutz/>.

d. Manage payment method

You can change the payment method you entered on registration at a later point in your user account under "Payment method". In this process, the same data is transmitted to our payment service provider (Volkswagen Payments S.A. in 19-21 route d'Arlon L 8009 Strassen) as for registration: first and last name, credit card details (credit card number, CVC code, expiry date), address and email address. The data processing required for this is performed for the purposes of contract fulfilment (Article 6, paragraph 1, letter b, GDPR).

D. Data Processing in connection with charging sessions

I. Use of the charging service

Charging stations can be started and ended using your Charging Card at the charging station or via the App. To control the charging session via the App, you select a charging station in the App. Your RFID identifier, Charging Card number and Elli-internal contract number are sent to the charging station for authentication. The charging session starts once authentication is successful. In order to ensure the functionality and processing of your Charging Plan and the relevant charging sessions, we process your personal data and technical data in conjunction with the Easy Charging Contract for the relevant Charging Plan (including charging statistics and charging history (e.g. charging volume, duration or start and end of a charging session), your vehicle identification number (the first eight digits only) and the location of the charging station used (charge point address (EVSE))). The data processing required for this is performed for the purposes of contract fulfilment (Article 6, paragraph 1, letter b, GDPR). Depending on the charging station you use, to process charging sessions, we use IONITY GmbH, Moosacher Strasse 84, 80809 Munich and has-to-be GmbH, Salzburger Straße 20, 5550 Radstadt, Austria as data processors who act and process data on our behalf.

To provide you with a comprehensive charging service, we also work with providers who process data under their own responsibility. Under these circumstances, we transmit your Charging Plan ID in conjunction with the relevant Easy Charging Contract, which cannot be traced back to you personally. You can find more privacy information on the relevant provider's website. The following providers are part of our charging network:

- Hsubject GmbH, EUREF-Campus 22, 10829 Berlin (www.hsubject.com)
- GIREVE, 108-110 Avenue du Général Leclerc, 78220 Viroflay, France (www.gireve.com)

II. Invoicing and Billing

Data processing for the purpose of invoicing and billing is carried out by Elli Czechia if you use charging stations within Czech Republic or by Elli Germany if you use charging stations outside Czech Republic. Based on the Charging Plan and charging history information, we calculate the costs of the charging session using your selected Charging Plan for the purposes of invoicing and billing. For invoicing and billing purposes, we pass on the charging history and your first and last name, address, email address, if you have supplied it, your VAT ID number to Nitrobox GmbH, Fuhlentwiete 14, 20355 Hamburg whom we have commissioned with the data processing and who acts and processes data on our behalf. The data processing required for this is performed for the purposes of contract fulfilment (Article 6, paragraph 1, letter b, GDPR).

III. Charges and reversed charges

Data processing for the purpose of charging payments and of reversed charges is carried out by Elli Czechia if you use charging stations within Czech Republic or by Elli Germany if you use charging stations outside Czech Republic. With the debit order, we send the relevant payment service a charge text that will appear on your account statement, as well as the amount. The text includes the charge period and billing number. If a charge fails, such as because the payment method used does not have sufficient coverage or the period of validity has expired, we shall be informed of this by the payment service. In that event, we are sent the reason for the error and your identification number that was generated by us. In the event of a reverse charge you have not personally authorised, for instance if a charge was reversed due to being insufficiently covered, you commission us to perform the charge again. In the event that you initiate a reverse charge procedure or we grant you a refund, the relevant amount is charged back by the payment service. We transmit the following data to the payment service for this purpose: amount, the reason for the reverse charge and your user ID and the transaction ID generated by us and allocate to the session. The data processing required for this is performed for the purposes of contract fulfilment (Article 6, paragraph 1, letter b, GDPR).

IV. Charge at Home (only available for Wallbox with connectivity functions)

Please note that use of Charge at Home and associated online services requires electrical start-up and configuration of a wallbox with connectivity functions. To ensure that your wallbox remains communicative and up-to-date during the electrical start-up and configuration process, we process technical data (e.g. device identification, brand, generation, device type and software version).

If you wish to use Charge at Home and associated online services, you must authorise your wallbox and pair it with your existing user account using a pairing code. You can then access charging statistics and charging history, manage and remotely control your wallbox (e.g. control access permissions) and manage RFID cards (e.g. activate or deactivate for use on the wallbox) at any time. In conjunction with use of Charge at Home and associated online services, we process the following personal and additional technical data for the purposes of service provision and delivery: customer and user identification (data provided from your user account and email addresses of your optional enabled users), wallbox ID and RFID identifier and wallbox management status (e.g. administrator rights), RFID charging card numbers for your enabled RFID charging cards, charging statistics and charging history (e.g. charging volume, duration or time, start and end of a charging session, charging ID), connection status and last communication timestamp (history and logging data) and optional location and location description for your charging station (charge point address (EVSE)). We process your personal data for the purposes of

contractual fulfilment (see Article 6, paragraph 1, letter b GDPR) for as long as this is required for the above purpose and generally delete it without delay after the legal basis ceases to exist, if it is no longer required for the stated purposes or if the stated purposes cease to exist and insofar as there is no other legal basis (e.g. retention periods under trade and fiscal law), otherwise after the other legal basis ceases to exist or if we are obliged to do so for other legal reasons.

E. Customer Service, Marketing activities, Retention Period, Third Party Providers

I. Contact and customer service

You can get in touch with us. In this context, we process the information and data you provide (including personal data) in a ticket in order to make contact with you and process your query (Article 6, paragraph 1, letter b GDPR). Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg and Majorel Berlin GmbH, Wohlrabedamm 32, 13629 Berlin assist us as processors and act and process your data on our behalf. Your data is also stored and processed in our CRM system. We use Salesforce.com, Inc. (The Landmark @ One Market Street, San Francisco, CA 94105, USA) as a processor for this purpose to act and process your data on our behalf. It is not possible to rule out Salesforce.com, Inc. having access to the information, so a corresponding EU standard agreement (appropriate guarantee on data processing in non-European countries) has been concluded. You can access the EU standard contractual clauses at the URL <https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX%3A32021D0914>. We delete your data as soon as we have answered your query to your satisfaction, providing there are no other retention periods (e.g. fiscal retention periods) that come into conflict with this.

II. Consent to Marketing activities

If you would like to receive information about our products, you can order the corresponding advertising. For this purpose, the following data will be processed within the scope of the consent to be given by you (Article 6, paragraph 1, letter a GDPR) for the purpose of advertising delivery: Name, first name, e-mail address and telephone number.

You can revoke your consent at any time and free of charge to Volkswagen Group Charging GmbH with effect for the future. You will find further information on how to assert your rights in the section "Your rights" of this data protection declaration.

As soon as you have revoked your consent, your personal data will be deleted, unless other retention periods (e.g. tax retention periods) conflict with this.

III. Retention Period

We process your personal data for as long as this is required for the respective purposes. If we process data based on a legitimate interest and you object to such data processing, we shall delete personal data, unless its further processing is permitted or required in accordance with relevant statutory provisions. We shall also delete personal data if we are obliged to do so for other legal reasons. Applying these general principles, we usually delete personal data as soon as the legal basis for the respective processing ceases to exist, if it is no longer required for the stated purposes or if the stated purposes cease to exist, provided there is no other legal basis or obligation for further processing (e.g. retention periods under trade and fiscal law).

IV. Data Processing by Third Party Providers

If service providers process personal data on our behalf, we have concluded contract processing agreements with each of the service providers and agreed on appropriate guarantees on safeguarding the protection of personal data with these service providers. We also select our

service providers with care. They process personal data exclusively for the purpose of fulfilling their responsibilities and are contractually bound by our instructions, have suitable technical and organisational measures for the protection of personal data at their disposal and are regularly monitored by us. EU standard contractual clauses for transferring personal data to processors in third countries (appropriate guarantee for data processing in non-European countries) have been concluded accordingly. You can access the EU standard contractual clauses at the URL. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021D0914>. You can find an overview of the service providers we use at any time on www.elli.eco.

F. Your rights

You may assert the following rights vis-à-vis the data controllers at any time free of charge.

Right of access: You have the right to receive information from us (Article 15 GDPR) regarding the processing of your personal data.

Right to rectification: You have the right to request that we rectify (Article 16 GDPR) any of your personal data that is incorrect or incomplete.

Right to erasure: You have the right, in the event that the requirements specified in Article 17 GDPR have been met, to request the erasure of your data. Accordingly, you may request the erasure of your data, for instance, if it is no longer necessary for the purposes for which it was collected. Furthermore, you can also request erasure if we process your data on the basis of your consent and you withdraw this consent.

Right to restriction of processing: You have the right to request the restriction of the processing of your personal data if the requirements specified under Article 18 GDPR have been met. This is the case, for example, if you dispute the accuracy of your data. You may then request that processing is restricted for as long as it takes to examine the accuracy of your data.

Right to object: If processing is based on an overriding legitimate interest you have the right to object to the processing of your data. An objection is permissible if processing is either in the public interest or on account of a justified interest of Volkswagen Group Charging GmbH or a third party. In the event of objection, you are kindly requested to notify us of your reasons for objecting to data processing. Besides this, you also have the right to object to data processing for the purpose of direct marketing. The same applies to profiling, if this is related to direct marketing.

Right to data portability: Provided that the data processing is based on consent or on the fulfilment of a contract and that it is also carried out using automated processing, you have the right to receive your data in a structured, common and machine-readable format and to forward it to another data processor.

Right of withdrawal: Insofar as the data processing is undertaken based upon consent, you have the right to withdraw your consent, with future effect at any time, free of charge.

Right to lodge a complaint: You also have the right to lodge a complaint with a supervisory authority (e.g. with the data protection officer for Berlin) regarding our processing of your data.

G. Your points of contact

Points of contact for exercising your rights

For the exercising of your rights and more information, please send an email via privacy@elli.eco or a letter to the Data Protection Officer of Volkswagen Group Charging GmbH, Mollstraße 1,

10178 Berlin. Irrespective of the agreements between Elli Czechia and Elli Germany you may also contact Elli Czechia for exercising your rights.

Data Protection Officer

Our Data Protection Officer is your point of contact for issues related to data protection:

Datenschutzbeauftragter der Volkswagen Group Charging GmbH Mollstraße 1, 10178 Berlin
privacy@elli.eco

Version dated: November 2022