

ELECTRICWEB

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A. Overview of the Privacy Policy

We at ELECTRICWEB value the trust reposed on us by you and consider the safety and security of your personal data as our utmost priority. To build on the trust further, we would like to take this opportunity to help you understand our privacy practices.

This privacy policy describes the several type of personal data we collect, various sources through which we collect your personal data, how and to what intent we process your personal data, with who we share your personal data and finally your rights and choices pertaining to the personal data being generated while using ELECTRICWEB mobile application and related infrastructure.

This policy applies to users of ELECTRICWEB's services anywhere in the world, including users of ELECTRICWEB's apps, websites, features, or other related services, unless covered by a separate privacy notice.

User: individuals who request ELECTRICWEB's Electric Vehicle (EV) Charging infrastructure for charging their electric vehicles.

ACDC Electric Infrastructure Private Limited is the data controller for the personal data collected in connection with use of ELECTRICWEB's services across the world.

Any questions, comments, concerns and complaints about ELECTRICWEB's data practices can be submitted here: support@acdcelectric.in

B. Updates to the Privacy Policy

This is to inform you that we shall have to occasionally update our privacy policy from time to time and your continued use of our services, post any changes to the privacy policy, is deemed to be acceptance of those changes. Hence we encourage users to periodically review this privacy policy for the latest information on our privacy practices.

Effective date: June 30, 2020

C. Data collection and use

a) Data collection

- i. Data provided by users directly to ELECTRICWEB;
- ii. Data created while using ELECTRICWEB services;
- iii. Data from other sources.

i. Data provided by users directly to ELECTRICWEB

We ask for the following information when you create an ELECTRICWEB EV user account profile:

- Mobile number;
- Name (First Name and Surname);
- E-mail address;
- Password;
- Electric Vehicle owned details like car registration number (along with RC document), Car Make/Model, compatible EV connector;
- Photograph;
- Security questions, if any.

Some other data like date of birth, alternate contact details, communication address may be directly required from your end in case you wish to avail some additional services such as RFID facility from our end.

Please note we may use the photos submitted by user to verify their identities, such as through facial recognition technologies. For more information on this you refer to the section on “How ELECTRICWEB uses personal data”.

ii. Data created while using ELECTRICWEB services

We collect the following information whilst user uses ELECTRICWEB app or related infrastructure including EV chargers:

- Location data: We collect precise or approximate location data from the EV charger being used by the user to charge his/her EV and/or a user's mobile device on receipt of requisite approvals from the users only- ELECTRICWEB collects this data from the mobile device when the ELECTRICWEB app is running in the foreground (app open and on-screen) and in some countries (which do not include the European Union) ELECTRICWEB may collect such information even when the ELECTRICWEB app is running in the background (app open but not on-screen) of their mobile device. Disabling sharing of location data shall affect some of the functionalities of the app such as using the exact location to locate nearest charging stations for the EV.
- Other data: ELECTRICWEB collects various other information pertaining to the usage of the app/services including the following:
 - data pertaining to interaction of users with our services including access dates and times and all in-app/system activity;
 - data pertaining to EV charging activity and EV charging status, EV charging/ discharging rate (if applicable), EV charge status, EV unique identifiers including software, operating system, versions;
 - data related to transaction details including amount charged, slots booked, slot duration, payment method, usage of promotional codes etc.
 - data pertaining to device (including hardware details) used to access our services- IP address, browser/operating system its versions, software, preferred languages, device's unique identifiers, device motion data and mobile network data.

Other data being collected by us may include user's demographic data and information shared by users when they connect with ELECTRICWEB customer support including any user provided ratings or compliments for services offered are also collected.

Please note all payment related services are handled by a reputed third-party payment provider. ELECTRICWEB doesn't store any credit card/ debit card/ other banking details. when you pay using any of the above mentioned modes for charging your EV on ELECTRICWEB EV charger network.

iii. Data from other sources

- Data received under referral program.
- ELECTRICWEB business partners such as payment providers, social media services, or apps or websites that use ELECTRICWEB's APIs or whose APIs ELECTRICWEB uses.
- Agencies/vendors helping in user verification for regulatory, safety, and security purposes.
- Car manufacturers, Insurance or financial services providers for users.
- Other publicly available data or data sourced through marketing service providers.

b) Data Use

ELECTRICWEB processes the personal data to provide a smooth and easy EV charging solution and also to meet the following objectives:

- Services: We use the data to offer, maintain and always improve upon our best in class services with extensive customizable options to suit user's requirement. This includes using the data collected to update user accounts, verify users identity and EV charging history, facilitate payment for our services, improve physical infrastructure basis user reviews and ratings, track and share progress of EV charging, personalize accounts including favorites and quick access options, offer new features. The in-system activity data collected is also used to troubleshoot bugs and other operational problems.
- Safety and security: We use the data such as device, location, profile, usage, and other data to prevent, detect, and combat fraud or unsafe activities. Also, user feedback and rating data shall be used to maintain safety and security compliance of physical charging infrastructure.
- Customer service: Data collected, including recordings with prior consent, during interactions with customer service executives and otherwise to investigate and address concerns. This shall also be used to improve customer service responses and maintain and encourage long-term relations with user.

- R&D: We may also use the data for research, testing purposes. Also, the data may be used for product/feature development, create AI models/processes, machine learning tools etc. with an objective to improve the overall safety, security and user experience.
- Marketing: We may also use the data to market our services to our users including user communication pertaining to updates/new features, news, events, promotional offers, surveys.
- Strategy: We may use personal data to develop (or add on) our business strategy, build/ improve internal administrative processes.
- Non-marketing: We may use the data to inform users about transactional receipts, changes to our terms & conditions, policies and send other non-marketing communications.
- Legal- We may use the personal data for internal audit, compliance with legal, regulatory or contractual requirements, investigate any claims or disputes.

c) Data processing basis

ELECTRICWEB processes personal data:

- To provide required services: ELECTRICWEB processes **data provided by users directly to ELECTRICWEB**, such as user profile, communication address, to maintain user accounts; verify user identity; improve the services/ features offered to the users; and communicate with the user details pertaining to the account. The **data created while using ELECTRICWEB services** to help users operate the account efficiently, including but limited to tracking EV charging, making payments, one-touch slot booking at the favorite charging locations, tentative price quote.
- With your consent: ELECTRICWEB may collect and use personal data basis user's consent. User may revoke at any point in time which may affect some of the features/ services being offered.
- For legitimate interest of ELECTRICWEB: ELECTRICWEB processes data for direct marketing and promotions (including **data from other sources**); maintaining and enhance user's safety; security including combating/ investigation fraud, security threats etc.; enforcing ELECTRICWEB's Terms of service. This may also include processing

of personal data to the extent necessary for the interests of other people or the general public and to protect the rights and safety of others.

- To fulfill legal obligations: ELECTRICWEB collects and processes personal data to comply with various laws and regulations (National, Regional, and Provincial) under which it operates. We may share the personal data with law enforcement agencies in relation to criminal acts or threats to public safety, or requests by third parties pursuant to legal processes.

d) Data sharing

ELECTRICWEB shares personal data with:

- Parent company/ group companies/ affiliates/ subsidiaries in order to achieve the objectives stipulates in **Data Use**.
- Business partners, service providers, consultant, marketing and research firms, authorized vendors/agents.
- Government/ law enforcement / tax / regulatory agencies as permitted under relevant laws or regulations; request from these agencies; or where data disclosure is otherwise appropriate due to safety or similar concerns including but not limited to enforcing ELECTRICWEB's Terms of service and other policies, safeguarding ELECTRICWEB's rights or property.
- Other individuals during negotiations for merger, acquisition, sale, transfer, joint venture, consolidation, restructuring, reorganization, disposition, financing, assignment of all or any portion of ELECTRICWEB's business by or into another company.
- Third parties, with prior user consent, offering their own services.

e) Cookies and other similar technologies

ELECTRICWEB use cookies and other identification technologies on apps, websites, emails and online ads which collects and stores data basis your activity for purposes including but not limited to authenticating users; remembering user preferences; determining effectiveness of campaigns/ content; understanding user behavior/interests, usage trends. ELECTRICWEB may allow others to carry out various analyses and serve

advertisement on ELECTRICWEB's behalf across the internet. User can control and set their cookie related preferences by changing browser settings.

D. Transparency

a) Data Transfers

ELECTRICWEB ensures all sorts of contractual and legal measures while sharing data within our group companies or with third-party business partners, service providers etc. This arms-length approach ensures processing of your personal data for specific purposes only thus safeguarding your data from any kind of unsolicited use, security threats and to prevent, detect, and combat fraud or unsafe activities.

b) Data security and access

ELECTRICWEB have put in place required checks and balances to protect user data from unauthorized access and fraudulent use. We use state-of-the-art encryption technology, robust user verification processes which are reviewed and updated on regular intervals. Also, users can at any point in time request access to their personal data in whatever format they seek so. In case you have a reason to believe that your personal data security has been compromised please notify us at the earliest using the details mentioned in **Contact us** section.

Any interaction with ELECTRICWEB services through social media platforms may expose you to broadcast of your personal information in accordance with your privacy settings for social media platforms and ELECTRICWEB shall neither be liable for any such breach nor for processing of such personal data. Data received by us from these social media platforms shall be used and processed in accordance with our privacy policy.

i. California privacy rights

California law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties. To make such a

request, please contact us at the information provided in **CONTACT US** section.

ii. EU privacy/data protection rights

EU General Data Protection Regulation (GDPR) has provided the below rights to the EU residents:

- **Right to information**
- **Right to access** the Personal Information that are processed
- **Right to erasure** ("Right to be forgotten")
- **Right to rectification**
- **Right to restriction of processing**
- **Right to data portability**
- **Right to object**

EU residents can exercise these rights by contacting us at the information provided in **CONTACT US** section.

c) Data retention and deletion

ELECTRICWEB retains user profile, transaction details and other personal data as long as user maintains their ELECTRICWEB account. Such data may be deleted or rendered anonymous on receipt of account deletion request from the user.

ELECTRICWEB may keep certain user data even after receiving an account deletion request if necessary, such as to comply with tax, regulatory, legal requirements and may further use it for purposes of safety, security, fraud prevention and detection, and research and development.

ELECTRICWEB may keep location data, usage data, device data, EV data, and financial transaction data for up to 7 years from your last transaction with us.

E. Marketing and communication choices

ELECTRICWEB consistent with your choices and preference settings provides you with service updates and notifications, like EV charging status, and updates pertaining to your account activity. These service notifications

are necessary for the smooth use of ELECTRICWEB app and cannot be disabled.

You may also receive tailor-made offers to suit your requirements basis your account activity, preferences and use of our services, purchase history, promotions activity, surveys etc. through push notifications with your prior consent.

Both Apple (iOS) and Android devices notify users the first time the ELECTRICWEB app requests permission to access certain types of data and gives users the option to grant or refuse permission while Android devices notify users of the permissions that the ELECTRICWEB app seeks before their first use of the app, and use of the app constitutes a grant of such permission.

Users have the option to opt out of receiving promotional emails from ELECTRICWEB by executing the unsubscribe option in the emails. However, non-promotional communications, such as receipts for rides or information about their account is beyond these opt-outs.

F. Contact Us

If you have any issues, queries, or complaints regarding the processing of your personal data, please contact us at support@acdcelectric.com.

Correspondence address:

ACDC Electric Infrastructure Private Limited
UB-36A, Antriksh Bhawan
22, K G Marg, Connaught Place,
New Delhi- 110001

If you would like to opt out of marketing communications, request access to, correction or deletion of your personal data, or request that the processing of your personal data be restricted, please either-

- email support@acdcelectric.com; or
- call us at +91-11-23350140