GDPR

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# 1. Introduction

The General Data Protection Regulation (GDPR) is a tough privacy and security law that imposes obligations onto organisations (anywhere in the world), so long as they target or collect data related to people in the EU.

This report is made in accordance with the GDPR, so that users know their rights and which personal data is being processed by us, ElectricGo. It also covers Data Retention policies and Data Breaches.

# 2. Contact

All questions regarding privacy, or general questions about your rights and more, can be asked at [privacy@electricgo.com](mailto:privacy@electricgo.com).

For personal and sensitive questions, it is possible to contact our *Data Protection Officer* (Benjamin Moreira) at [benmorprivacy@electricgo.com](mailto:benmorprivacy@electricgo.com).

# 3. Processing of Personal Data

## What

Personal Data is *all* the information relating to an identified or identifiable natural person.

Under processing of Personal Data we understand all the operations that are operated on Personal Data. Those include, but are not restricted to collection, recording, storing, alterations, retrieval, restriction, erasure, etc. etc.

## The information we collect

To serve its purposes, and provide its services, ElectricGo is processing the following data:

* First name
* Last name
* Email
* Phone number

## Where + our intentions

The processing of this data is done in both Portugal and Germany, and is only retrieved by us, ElectricGo. We will never sell or transfer this data to other parties outside of our company, and also have no intentions to transfer it to other countries except Portugal and Germany.

## Legal base

The processing of your personal data is covered by the legal basis of the GDPR that includes both **consent** and **legitimate interests**.

By letting your administrator registering an account on ElectricGo, and you, the user, actually using the application, you consent for the processing of your personal data for our identification and verification purposes, and nothing more. If your personal data is being used without your permission, please contact [privacy@electricgo.com](mailto:privacy@electricgo.com).

## Legitimate interest

As a company that wants to have a secure application, we have the legitimate interest to verify and identify all the users of our platform, for which the requested data is necessary. We don’t intend to use this data for anything else.

When processing your personal data, ElectricGo guarantees you, the user of the ElectricGo application, that the following GDPR principles are being respected and followed (Art. 5):

* Loyalty: your data is being treated in a lawful manner.
* Purpose: your data is collected for identification and verification purposes and not further processed in a manner that is incompatible with those purposes.
* Data minimization: we only ask and store what is really necessary and relevant for our identification purposes. We guarantee that no irrelevant data is being collected.
* Accuracy: the data should be accurate and be kept up to date. Users have the right for modification and alteration of their data (see 4. User Rights).
* Storage Limitation: the data will be stored no longer than is necessary for the purposes for which the personal data are processed, and will be erased as soon as the user demands to be anonymized and the data to be deleted.

## Retention period

ElectricGo guarantees that the personal data will be stored as long as the user is using the application and doesn’t require to be anonymized, as this data is necessary for the identification.

The users have the right all the time to demand anonymization or deletion of their data, unless it is not allowed because of lawful restrictions and reasons. This means that ElectricGo won’t use data no longer as needed, and will immediately erase all traces of your data when requested to.

# 4. Your User Rights

The GDPR provides the following data rights for EU individuals and users of the ElectricGo Application:

## **The right to be informed:**

Please take a look at [3. Processing of Personal Data.](#_3._Processing_of)

## **The right of access:**

As a user you have the right to request your personal data at [privacy@electricgo.com](mailto:privacy@electricgo.com), free of charge. We will respond within maximum a month with a copy of your data in a machine readable format.

## **The right of rectification:**

You as a user has the right to rectify inaccurate information, or to complete incomplete information. You can request this at [privacy@electricgo.com](mailto:privacy@electricgo.com), please include “Rectification” in the title, and we will respond within a month.

## **The right to be forgotten:**

You have the right to, at any time, withdraw your consent about us processing your Personal Data by requesting us to erase your data/to be forgotten. This can be done by sending a request to [privacy@electricgo.com](mailto:privacy@electricgo.com), please include “Erasure” in the title. We will respond to you within a month.

## **The right to restrict processing:**

As an individual, you have the right to ask for restriction of your personal data. We will then still store your data, but not use it. Please understand that it is then not possible to use the ElectricGo application as we need this to identify you.

Note that this is not absolute.

This can be done by sending a request to [privacy@electricgo.com](mailto:privacy@electricgo.com), please include “Restriction of processing” in the title. We will respond to you within a month.

## **The right to data portability:**

You have the right to obtain your personal data and use it for your own reasons. Note that this only applies to data you provided us earlier.

This can be done by sending a request to [privacy@electricgo.com](mailto:privacy@electricgo.com), please include “Portability/Data Copy” in the title. We will respond to you within a month.

## **The right to object:**

Users have the right to object to their personal data being used and processed by us for certain purposes, unless we have a compelling reason. More information can be requested at [privacy@electricgo.com](mailto:privacy@electricgo.com), please include “Object” in the title. We will respond to you within a month.

# 5. Data Security

TBD: Explain how we protect data -> for example: Implementing access control -> only admins can see

# 6. Data Breaches

TBD (see below what should be mentioned)

Explain that in case of a breach that result in risk to rights and freedom of individuals, we have to notify the relevant supervisory authority (depends on country) and in some cases the individuals themselves.

We should outline the measures in place to detect, report, and investigate data breaches.

We also need a data breach response plan that includes: A process for identifying and assessing the severity of a data breach.

A process for notifying the relevant authorities and individuals in a timely manner.

A process for containing the breach to prevent further harm.

A process for conducting a thorough investigation to determine the cause of the breach and identify any areas for improvement.

# 7. Conclusion

TBD

# 8. Sources

<https://www.gdpreu.org/the-regulation/list-of-data-rights/right-of-access/>

<https://www.privacypolicies.com/blog/gdpr-eight-user-rights/#How_To_Create_A_Gdpr_Compliant_Privacy_Policy>

<https://moodle.isep.ipp.pt/pluginfile.php/259220/mod_resource/content/1/2022%20ISEP%20LAPR5%20aulas%20RGPD%20EN.pdf>

The previous sources still has to be transformed into the right format.