



Fuuse

Privacy Policy

Last updated April 22



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Privacy Policy

This policy complies with the UK General Data Protection Regulation (UK GDPR), tailored by the Data Protection Act 2018.

Miralis Data Ltd is certified by the Information Commissioners Office as a third-party data handler under reference number ZA194325 and is certified as Cyber Essentials Plus by IASME, a National Cyber Security Centre partner, under certificate number IASME-CE-009014.

What does this Privacy Policy cover?

This Privacy Policy provides information regarding the personal data which is processed by Miralis Data Ltd via its charge point management system Fuuse (herein after called "Fuuse") in relation to customers, suppliers, business partners, stakeholders and/or investors including visitors to the Fuuse and Miralis websites (hereinafter "websites"), portals and users of our apps.

This Privacy Policy explains what personal data is processed, why we process your personal data, for which purposes we process your personal data, how long we hold the personal data for, how to access and update your personal data and where to go for further information or to lodge a complaint.

What personal data do we process about you?

We may collect and process the following key data from you:

Contact: Details of how to contact you e.g. title, name, address, email address, telephone numbers, any other information you choose to divulge as part of registering for a product or service, or a query.

Property: Details of a property / location – e.g. address.

Vehicle: Details of your vehicle e.g. make and model.

Any other personal information that you provide to us during a phone call.

Marketing Preference: Your consent for us to send marketing materials and the preferred channels.

Cookies: Information about website visits, interactions.

Your communications with the company for tracking faults.

In addition, depending on the type of interaction you have with Fuuse, we may also collect the following personal data.

Charge Card or App Users means every person that uses a charge card, charge token or app offered by or powered by Fuuse (“Charging Access Device”) to obtain access to a charge point. Charge Card Users interact with Fuuse by registration and use of the Charging Access Device.

Registration: When you register a Charging Access Device with Fuuse we collect your name, email address, Charging Access Device number, home address and may also collect payment details including bank account details or credit card details and whether you opt for public charging. In the event a Charging Access Device is provided to you by a third party (such as a lease company, a fuel card provider or your employer) and/or a party which pays for the use of your Charging Access Device, said third party has registered this Charging Access Device on your behalf, sharing your Charging Access Device number with us.

Use a Charging Access Device: When you use a Charging Access Device on a Fuuse operated connected Charge Point we additionally (to the registration data) collect your charge session details which are your Charging Access Device number, start/stop times, your electricity use, Charge Point ID, location of the Charge Point used. The same applies when you scan a QR code on a Charge Point and opt for downloading an app to create a Fuuse account, in which case we only not will have a Charge Card number. When you use any other charge point, thus not operated by Fuuse but made accessible to you with a Charging Access Device we will only

receive the charge session details listed in combination with your card number from the charge point operator. This enables us to identify you and invoice you for the charge session. If the Charging Access Device is provided to you by a third party who pays for your use of the Charging Access Device we share the charge session details listed with this party for billing and settlement purposes.

Charge Point Users:

Registration. Before you can start using a Charge Point we request that you register it in your Fuuse account. When you register a Charge Point with us in your Fuuse account, we collect your name, email address, address where Charge Point is installed, Charge Point number (Charge Point ID) and payment details. No passwords are stored in Fuuse. All passwords are separately stored in Microsoft Active Directory and used for remote authentication.

EV lease drivers. Lease drivers do not purchase a Charge Point, but may have a Charge Point installed at their home address. In order to facilitate this Fuuse is provided with your name, contact details and car type by your lease company or your employer. Fuuse collects the information you provide with us regarding your Charge Point preferences

Ad hoc Charging. When you scan a QR-code displayed on a Charge Point to enable you to do ad hoc or pay-as-you-go charging two options are presented to you. You can opt for charging with direct payment, in which case we only request you to provide us with your payment card details.

Fuuse will only store the last four digits of your credit card number. For security a third-party payment provider will process your payment. The second option would be to download an app and create an account. The data collected will be the same as mentioned above.

Registration. All data stored is encrypted. With charge card of another e-mobility service provider: When you use a Fuuse operated charge point with a charge card, charge token or app not offered by or powered by Fuuse we will only collect your charge card ID (thus not your name), start/stop times, your electricity use, Charge Point ID and location of the Charge Point. These charge session data will be shared by us with your

charge card provider for billing and settlement purposes. No passwords are stored in Fuuse.

Smart Charging. When you own a Fuuse connected Charge Point you are presented with functionalities and settings of your Charge Point. First of all, we collect the data you provided when registering the Charge Point in your Fuuse account. When you opt for reimbursement we, or a third-party, may collect the data regarding your electricity rates charged by your utility company as provided by you to reimburse you for the energy costs related to charging at home. The lease company and/or your employer will be invoiced for the costs of your charging sessions of the Charge Point at home showing your Charge Card number, start/stop times, your electricity use, Charge Point ID, location of the Charge Point used, this invoice will also show your use of your Charge Card when public charging is activated. When you opt for guest usage by which you enable other EV drivers to use your Charge Point we collect the settings you chose. This can be paid guest usage by which you add a charging tariff or free guest usage. The setting of paid guest usages also allows you to create a group of Charge Point users in the possession of a Charge Card to charge at your Charge Point for free by adding the Charge Card numbers of these persons to your account.

In that case we collect the Charge Card numbers for which you allow such. When you publish your Charge Point we will make the location and tariff settings of your Charge Point visible in our charge map in the Fuuse and Fuuse app. Upon request of grid operating companies we might collect the power usages of your Charge Point at certain moments and share it with the grid operating companies on an anonymous and aggregated level for grid balancing purposes.

When you visit our website or download our Apps:

General. If you use our applications for mobile devices, Fuuse collects your location data after your consent in order to make it possible for you to use the navigation option, to receive notifications on the charging, or to enable you to notify us about broken charge points. You can easily switch the location functionality off in our app if you want to withdraw your consent. Besides this your mobile device will automatically share certain data with Fuuse as the device interacts with the app.

Exchanges by device: When you visit our websites data is automatically collected by the technology platforms providing the experience. For example, your web browser or mobile device may share certain data with Fuuse as those devices interact with our website. This data includes device ID, network access, storage information and battery information, cookies, IP addresses, referrer headers, data identifying your web browser and version and web beacons and tags.

Fuuse Mobile App: The Fuuse Mobile App is the environment in which you create an account. This is accessible directly via the Fuuse Mobile App. When you use the Fuuse Mobile App you create an account for which we collect the data mentioned with “Charge Card Use, registration” and “Charge Point User”. When you use this account we also collect the timestamp of your last login.

Other applications: Fuuse is continuously striving to offer the best and smartest

charging solutions. To avoid an ongoing update of this privacy policy we also use application specific privacy policies. You will be informed on these privacy policies before said applications collect your personal data. As mentioned in the application specific privacy policies this privacy policy will form an integral part of the application specific privacy policies.

When you interact directly with us:

Newsletter and publications: If you subscribed to our newsletter or other publications, we will collect your name and contact information so that we can send these to you. You can unsubscribe to this service at any moment.

Campaign or competition: If you choose to enter campaign or competition, we ask for your personal data necessary to run the campaign, to announce the prize-winner(s) and to gauge the response to any marketing and provide you with ongoing marketing offers if you have agreed to receive these as part of your participation.

Job applicants: If you respond to a vacancy on our website, we ask for your details, including your resume. We use these details to evaluate your application and to communicate with you regarding that vacancy. We also

use third party (software) providers for the processing of responses to our vacancies on our website.

Surveys: If you participate in our surveys, we will collect your personal data as part of customer satisfaction research related to the products and services offered to you.

Business data: If you are a business customer, supplier, business partner or stakeholder Fuuse will process your private contact information (such as name, postal or e-mail address, and phone number) only if necessary. Fuuse will also process your business contact and other information (such as job title, department, name of organization and your dealings with Fuuse on behalf of yourself or the relevant business customer, supplier, business partner and/or stakeholder).

Other: If you contact us by phone or email, we will collect the data you provide us with. Emails will be stored in our databases. Information provided and related to a follow up action from our end will also be stored in our databases.

Screening:

In addition, in order to comply with legal and regulatory obligations, to protect our assets and employees/contractors and specifically to ensure that we can comply with trade control, anti-money laundering and/or bribery and corruption laws and other regulatory requirements, we carry out screening (pre-contract and on a periodic basis post-contract) on owners, shareholders and directors of our Business customers, Suppliers and Business Partners. This screening takes place against publicly available or government issued sanctions lists and media sources. The screening does not involve profiling or automated decision making in relation to the counter-parties or potential counter-parties.

Who is responsible for any personal data collected?

Miralis Data Ltd

White Cross Business Park

South Road

Lancaster LA1 4XQ

Our customer support team can be contacted at +44 (0)333 050 4950 or via support@fuuse.io

Fuuse's Data Protection Officer is Martin Peters, and is responsible for all matter related to data protection and privacy. And can be contacted at datasecurity@fuuse.io

For what purposes do we process your personal data?

We process personal data covered by this Privacy Policy for the following purposes:

Business execution including:

- Researching, developing and improving products or services;
- Providing access to authorised third-party installers and sub-contractors in order for them to provide services such as driver support, maintenance and operational support to the client in order to ensure the effective operation of their Charge Point(s).
- Concluding and executing agreements with you, which includes billing and settlement and informing you on functionalities or features related to the products and/or services you use;
- Concluding and executing agreements with suppliers and business partners, in which case we will send your card number and information on your charging sessions to such party(ies) for payment settlement purposes .
- Recording and settling services, products and materials to and from Fuuse; managing relationships and marketing such as maintaining and promoting contact with existing and prospective customers, account management, customer service, and development, execution and analysis of market surveys and marketing strategies.
- Fuuse can use your charging data to advise on optimising charging behaviour with a view to battery preservation or lower charging fees including load balancing in case you opted in for this service. Fuuse can also use the charge card data to advise you on the type of subscription appropriate to your use.
- Fuuse manages the data on charging activity in our own network and in third party networks, by Charge Point and by Charge Card. This

data is used for the settlement of consumption. Fuuse also uses this data for market analysis and information purposes, with a view to improving our services and analysing the need in relation to the network. The information collected in this way cannot be traced back to personal data.

- If you use a Charge Point operated by Fuuse, Fuuse can use your charge session data for grid balancing grid purposes. The journey to powering the e-mobility movement comes with challenges for the grid and grid operators. In order to fulfil its legal obligations and to determine which charge points can assist in complying with this legal obligations grid operators can request us to share the EAN-code related to your Charge Point (which is publicly available information) and the maximum power of the Charge Point at a certain moment. This data will be stored for 5 years by this grid operators. In case your Charge Point is selected to be part of the group of Charge Points functioning as a grid balancing unit, either Fuuse or the grid operator will inform you or contact you.

Organisation and management of the business including:

- Financial management, asset management, mergers, de mergers, acquisitions and divestitures, implementation of controls, management reporting, analysis, internal audits and investigations.
- Health, safety and security including protection of an individual's life or health,

occupational health and safety, protection of Fuuse and staff,
authentication of

individual status and access rights; or

The purposes for which we process your personal data.

- Legal and/or regulatory compliance including compliance with legal or regulatory requirements including litigation and defence of claims or for a secondary purpose where it is closely related, such as:
 - Storing, deleting or anonymising personal data;
 - Fraud prevention, audits, investigations, dispute resolution or insurance purposes, litigation and defence of claims; or
 - Statistical, historical or scientific research.

Communication and marketing:

If you have consented to receive communications from Fuuse (or if you have previously purchased goods/and or services from us), you may receive offers that are tailored towards your preferences based on the information gathered about you from the various sources described above in order to provide you with better products and increasingly tailored services.

We may send you service updates and notifications without your advance consent only where such updates and/or notifications are necessary for the proper functioning of the Fuuse apps or other services that you use.

You may receive pertinent offers and communications via different channels and you may update your subscription preferences via your personal profile settings anytime or use the unsubscribe functionality for the different digital channels.

Why do we process your personal data?

The personal data covered by this Privacy Policy is only processed:

- in order to take steps at the request of an individual prior to entering into a contract;
- where it is necessary to comply with a legal or regulatory obligation to which the we are subject to;
- where it is necessary for the purposes of the legitimate interests pursued by Fuuse, except where such interests are overridden by the interests or fundamental rights and freedoms of the individual/s; or
- (only if legally required) with the explicit consent of the individual.

In those cases where processing is based on consent, and subject to applicable local law which provides otherwise, you have the right to withdraw your consent at any time. This will not affect the validity of the processing prior to the withdrawal of consent.

Security of your personal data

We have implemented technology and policies with the objective of protecting your privacy from unauthorised access and improper use. In

particular, we may use encryption for some of our services, we apply authentication and verification process for access to Fuuse services and we regularly test, assess and evaluate the effectiveness of our security measures.

When you enter your credit card details, please be informed that a third-party payment provider will process your payment. Fuuse will only store the last four digits of your credit card number, the expiry data and the security code.

We will only process your personal data where we have a lawful basis to do so. Fuuse is committed to safeguarding your personal data.

Who will we share your personal data with?

Your personal data is exclusively processed for the purposes referred to above (or for a secondary purpose where it is closely related, for example such as storing it) and will only be shared on a strict need to know basis with:

- Authorised sub-processors of Fuuse, limited to Microsoft and Stripe;
- A competent public authority, government, regulatory or fiscal agency where it is necessary to comply with a legal or regulatory obligation to which Fuuse or the relevant company/companies is subject to or as permitted by applicable local law; and;
- On request of a party, Fuuse can forward your data to such party if such party has a legitimate interest to obtain your personal data. Your employer or parties who pay for your charge sessions on your behalf might have such a legitimate interest. Fuuse and the requesting party will conduct a legitimate interest assessment to determine whether and which information is shared. The sharing of personal data in such case entails: the data provided by you at registration of the Charge Card and/or Charge Point including the settings for Smart Charging, the usage of the Charge Card and/or Charge Point, such as location of use, quantity of consumption and period of consumption. Please refer to the privacy notice of the relevant third party for information about how they handle your personal data.

Transfers of your personal data to other countries

At no point is your personal data transferred out of the United Kingdom or European Union.

What are the consequences of not providing your personal data?

Personal data gathered by Fuuse for these processes either directly or indirectly is

required in order to:

- Fulfil legal requirements and/or which is required for entering into a contract with a counter-party and continuing to contract with that counter-party.
- Maintain contact with business customers, suppliers and business partners, visitors to the website and investors.

Failure to provide us with the information required will negatively affect our ability to communicate with you, or our ability to enter into a contract with a counter-party or continuing to contract with a counter-party.

How long do we hold your personal data for?

Any personal data that is required for the purposes of conclusion and execution of

agreements with business customers, suppliers and business partners will be held during the duration of the contractual relationship and up to 7 years after.

For agreements which have a term of more than five years and for the purposes set out above these agreements will also be held for 10 years with effect from the commencement of the agreement.

In all other cases for the purposes set out above, including personal data gathered which relates the screening against publicly available or government issued sanctions lists and media sources, such personal data is held for no longer than 15 years after it was first gathered.

In all cases information may be held for a) a longer period of time where there is a legal or regulatory reason to do so (in which case it will be deleted once no longer required for the legal or regulatory purpose) or b) a

shorter period where the individual objects to the processing of their personal data and there is no longer a legitimate purpose to retain it.

Your rights in relation to your personal data

We aim to keep our information about you as accurate as possible. You can request:

- access to your personal data;
- correction or deletion of the personal data from Fuuse and any of its sub-processors;
- that you no longer receive marketing communications;
- that the processing of your data is restricted; and/or
- that you receive personal data that you have provided to Fuuse, in a structured, digital form to be transmitted to another party, if this is technically feasible.

If you want to exercise one of these rights please contact Fuuse:

Our customer support team can be contacted at +44 (0)333 050 4950 or via support@fuuse.io and datasecurity@fuuse.io.

Fuuse will only hold your personal data for a defined period of time, unless you request for it to be deleted.

Who can I contact for more information?

If you have any issues, queries or complaints regarding the processing of your personal data or our way of handling your request, please contact Fuuse at:

Miralis Data Ltd

White Cross Business Park

South Road

Lancaster LA1 4XQ

Our customer support team can be contacted at +44 (0)333 050 4950 or via support@fuuse.io

Fuuse's Data Protection Officer is Martin Peters, and is responsible for all matter related to data protection and privacy. And can be contacted via datasecurity@fuuse.io or at the details above..

If you are unsatisfied with the handling of your personal data by Fuuse,, then

you have the right to lodge a complaint to the Information Commissioner's Office at:

<https://ico.org.uk/make-a-complaint/> or by calling 0303 123 1113

Changes to this Privacy Policy

This Privacy Policy may be changed over time.

This Privacy Policy was last updated on 24 March 2022.

Cookies

Fuuse uses cookies to recognize you on a subsequent visit to the website. Cookies are pieces of information stored on your computer by your browser. Cookies enable us to collect information about the use of our services and to improve them and to adapt them to your wishes. Our cookies provide information with regard to personal identification. You can set your browser so that you do not receive any cookies.

Using cookies Fuuse can for instance ensure that you do not keep receiving or having to enter the same information on a visit to our site. This makes the use of our website easier for you. Cookies also allow us to see how the website is used and how therefore we can improve it further.

Types of cookies

Cookies that Fuuse uses can be divided into three types:

Functional and necessary cookies - Some cookies are indispensable if our website is to work properly. We use these cookies to retain your preferences. They include cookies that are used to keep recognizing you once you have registered. In this way you do not have to type in your

username and/or password every time you visit and will ensure that this Privacy Notice is updated over time.

We use cookies on our websites to provide you with the best user experience possible. You are entitled to view and modify closed parts of our website, such as your subscription details.

Social media and external cookies - When you are logged in on social media websites (Facebook, Google, , etc.) and have given consent via Fuuse website for this category of cookies, you can use additional functionalities. They include the easy sharing of information via Facebook Like, Google+, Twitter, etc. For the cookies that the social media parties place and the possible data that they collect with them, see the statements that these parties give about them. Remember that these statements can change on a regular basis. Fuuse has no influence over them.

Optimisation and relevance of cookies - We also use cookies to collect information. This information allows us to see which pages are visited most, which pages are effective and which pages produce error messages. We use this information to optimize the ease of use of the website. We use Google Analytics, to monitor the effectiveness of our website, and Google Adwords, to promote Fuuse through paid search advertisements.