

## **Privacy Policy**

autoSense AG, with its brand chargeON (hereinafter also referred to as "chargeON"), is committed to the fair and transparent processing of personal data. It is important to us that our customers understand when and what type of personal data we process in order to provide our services. We have therefore drawn up this privacy policy, which describes how we process your personal data in connection with the chargeON solution, including the use of our services via the website "autosense.co.uk" (the "website") or via the autoSense chargeON app (the "app"). Further information about your rights and how you can exercise them can be found in the section "Your rights" below.

Additional legal documents such as general terms and conditions (GTC), terms of use or conditions of participation may apply to individual or additional activities and operations.

#### 1. Responsibility

The data controller is:

autoSense AG Badenerstrasse 141 8004 Zurich

You can address data protection questions to chargeON directly at <a href="mailto:privacy@autosense.ch">privacy@autosense.ch</a>

#### 2. Categories of personal data, purposes of processing

Within the framework of the contractual relationship, you must provide the personal data that are necessary for the conclusion, execution and termination of the contract and to fulfil the associated contractual obligations, or which chargeON is legally obliged to collect (Art. 6 (1) (b) GDPR). Without this data, chargeON will generally not be able to conclude a contract with you.

In order to fulfil the respective contract, we collect some of the following data:

- Your contact details (in particular title, first name, surname, e-mail address, postal address, telephone number),
- Your payment information, bank details or credit card information,
- data for billing charging processes (charging processes at private/public charging stations according to charging time and amount of electricity charged),
- charging card number (RFID of the charging card), contract number
- charging station ID, installation location and grid connection of the charging station
- Information about your employment relationship (existence and termination for the purpose of checking eligibility for the employee shop of the fleet solution)
- Other data that you provide to us in the context of customer enquiries or
- fault reports
- Vehicle data (vehicle model, chassis number, GPS positions of the vehicle, driving behaviour, vehicle error messages, battery status, mileage,

The processing of your personal data mentioned above may also take place if this is necessary to realise a legitimate interest (Art. 6 para. 1 lit. f GDPR) of chargeON



- . Legitimate interests that may require the processing of personal data include for example:
  - Asserting, exercising or defending legal claims,
  - Prevention and investigation of criminal offences or misuse of our products, or
  - measures for business management and further development of services and products chargeON

We collect personal data directly from you or, in special cases, from your employer, not from third parties.

## 3. Information about data processing on the website

When you visit our website, we and the service providers we commission process your personal data for the purposes of operation and performance, as well as for the optimisation and further development of our offering.

When you visit the website, our system automatically collects data and information. This includes:

- Information about the browser type and version used
- the user's operating system;
- Information about the device type
- The user's Internet service provider
- The user's IP address
- Date, time and duration of access
- Websites from which the user's system accesses our website;
- Websites accessed by the user's system via our website.

We process this connection data within the scope of our legitimate interest for the purpose of optimising our website, namely to analyse how visitors use this website; it is also evaluated for statistical purposes and used for internal measures to improve security and quality.

We collect personal data for the proper presentation of the website, which is our legitimate interest (Art. 6 para. 1 lit. f GDPR).

#### a. Cookies & analysis and tracking tools

We use "cookies" on our websites to identify your browser or device. A cookie is a small file that is sent to your computer or automatically stored on your computer or mobile device by the web browser you use when you visit our website or install our app. At the beginning of your visit to our website, you can select the cookies you want in our preference centre and object to data processing at any time with future effect by preventing the storage of cookies through the settings in your browser or by changing the settings stored in the preference centre.

For more information, please refer to our cookie policy.

#### Google Analytics

We use Google Analytics to analyse website usage and optimise advertising measures. Google Analytics is a web analytics service operated and provided by Google Inc. (1600



Amphitheatre Parkway, Mountain View, CA 94043, United States). Google processes the data on website usage on our behalf and is contractually obliged to take measures to ensure the confidentiality of the data processed. Google also processes your data in the USA, among other places. Google is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. You can find more information on this at https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf en.

During your visit to the website, the following data, among other things, is recorded:

- · Pages accessed
- Your behaviour on the pages (e.g. length of stay, clicks, scrolling behaviour)
- Technical information such as browser, internet provider, device and screen resolution
- Source of your visit (i.e. which website or advertising medium brought you to us)

Your IP address is anonymised.

The recorded data is stored together with the randomly generated user ID, which enables the evaluation of pseudonymous user profiles. This user-related data is automatically deleted after 2 months. Other data remains stored in aggregated form for an indefinite period.

If you do not agree to this collection, you can prevent it by installing the browser add-on to deactivate Google Analytics or by rejecting cookies via our cookie settings.

## Google Tag Manager

We also use Google Tag Manager from Google Inc. for our website, apps and web interface. Google Tag Manager allows us to centrally manage code sections from tracking tools that we use. Google Tag Manager itself is a domain that neither sets cookies nor stores data, but merely acts as an administrator of the tags that are set.

#### Google reCAPTCHA

We use Google reCAPTCHA on our website as spam protection to distinguish between human users and automated software (bots). When using Google reCAPTCHA, personal data may be transmitted to Google. If you would like more information about this, please visit Google reCAPTCHA | Google for Developers <a href="https://developers.google.com/recaptcha?hl=de">https://developers.google.com/recaptcha?hl=de</a>

#### Hotjar

We use the analysis tool "Hotjar" on our websites to analyse your user behaviour. Your data is processed on the basis of your consent in the cookie settings.

Hotjar uses cookies and tracking codes on our behalf to collect your user data on our websites. Among other things, the following information is collected:

- the IP address of the end device,
- the type of device,
- the size of the device screen,
- the geographical location,
- the language used on the website,
- the referring domain, and
- the date and time of the website visit.

Your data is stored on servers in Ireland.



#### b. Contact form (request consultation)

If you have any questions or concerns, you can contact us as follows:

Private customers (B2C):

By email: privacy@autosense.ch

By post: autoSense AG, Badenerstrasse 141, 8004 Zurich, Switzerland

Business customers (B2B):

By email: privacy@autosense.ch

By post: autoSense AG, Badenerstrasse 141, 8004 Zurich, Switzerland

You can contact the data protection officer at autoSense AG as follows:

- By email: privacy@autosense.ch
- By post: autoSense AG, Sascha Riedel, Badenerstrasse 141, 8004 Zurich, Switzerland

You can contact us via a contact form or by e-mail and send us an enquiry. In this context, we process your name and contact details in order to contact you and process your enquiry.

We process personal data for the purpose of initiating a contract or fulfilling the contract or the respective service (Art. 6 para. 1 lit. b GDPR).

## 4. Information on the use of the app

#### a. General information

Our apps are available for download from the Google Play Store and Apple App Store. When you download the app, certain necessary information is transmitted to the app store you have selected (Google Play Store or Apple App Store). In particular, your username, email address, customer number, account number, time of download, payment information and individual device identification number may be processed. This data is processed exclusively by the respective app store and is beyond our control.

In order to offer you the app's functions and to ensure the stability and security of the app, we collect the following data, which is technically necessary for us:

- Operating system
- Session duration
- Device type
- IP address
- Amount of data transferred in each case.

# b. Searching for and finding charging stations

If you wish to use the filter function, the Google Maps map service (Google Inc.) will be integrated into your device. This map service enables us to show you charging stations. If you use this service, the map service will transmit your location at the time of your request after you have given your consent. Please note that this map service is provided by Google on its own responsibility. We are not responsible for Google's data processing. Information on data protection for the Google map service can be found at: (https://policies.google.com/privacy?hl=de)



# c. Processing through use of the chargeON app chargeON user account

To use our service via the app, you need a chargeON user account. You can register directly in the app to create and manage a profile. When you use our services, we process the data in your user account (your personal contact and identification data, such as your name, address, telephone number and email address).

### Provision of the charging card

In addition to the app, you can also use an RFID charging card ("charging card") to start and end a charging process. In order to send you the charging card, our service provider (processor) receives your contact details (first and last name and address). You can store the charging card in your profile and link it accordingly.

### Processing of your data for payment processing

We may process the following personal data for payment processing. For credit card payments (first and last name, credit card information, address and email address)

We collect the payment data for transmission to the payment services. In addition, we transmit the address and email address you have provided to us to the payment services.

We process the personal data for the use of the app for the purpose of performing the contract (Art. 6 (1) (b) GDPR).

# d. Processing of your data in the context of charging processes Use of the charging service

Charging processes can be started and ended directly at the charging station using your charging card or via your app. To control the charging process via your app, first select a charging station in the app. For authentication purposes, your RFID identification code, charging card number and contract number are transmitted to the charging station. Once authentication has been successful, the charging process will start. In order to ensure the functionality and processing of the electricity charging tariff and the respective charging processes, we process your personal data and technical data/vehicle data in connection with the electricity supply contract for the respective electricity charging tariff, including charging statistics and charging history information (e.g. charging volume, duration or start and end of a charging process, and the location of the charging station used).

#### chargeHome

If you use the chargeHome service as a fleet customer, you can access your fleet's charging statistics and charging history information at any time. Fleet members are given the opportunity to charge "at home" and receive a refund.

Fleet members receive an invitation to register on the chargeHome platform. This is necessary to collect individual information such as vehicle, charging locations and charging cycles, thereby enabling us to provide the service. To provide and deliver the service, we process the following personal and other technical data: address, customer and user identification, vehicle ID and status of the vehicle app, location of the vehicle and charging history information (e.g. charging volume, duration or time, start and stop of a charging process).



After registering for onboarding, the fleet member is forwarded to a service provider for vehicle linking so that a connection can be established between the vehicle's manufacturer application. The connection is required to collect the vehicle data; see above. However, this is done exclusively with your active consent. Only then can your vehicle data be processed for reimbursement. The scope of the vehicle data may vary depending on the manufacturer.

After onboarding, you will be shown the local electricity provider, which is required to identify the electricity tariff for the individual charging point.

This data is transmitted to the employer at regular intervals for the approval of the reimbursement. In this context, we act as a processor in accordance with Art. 28 GDPR.

#### Invoicing and billing

Based on the tariff and charging history information, we calculate the costs for the charging process for invoicing and billing purposes using the tariff you have selected. If contractually agreed with you, we process the charging history information as well as your first and last name, address, email address, if you have provided it, and your VAT identification number for the purpose of invoicing and billing. Your data may be transferred to a processor for the purpose of invoicing and billing.

We collect personal data for the purpose of fulfilling the contract (Art. 6(1)(f) GDPR).

## Collection and use of vehicle and battery data

In order to provide the respective service, in the form of chargeON or chargeHome, vehicle data for your respective vehicle is required. This may include:

- Vehicle data (e.g. make, model, battery capacity and vehicle identification number or mileage)
- Battery data (e.g. battery capacities of the electric vehicle, battery level, charging speed, remaining charging time or plug status)
- Location data (e.g. GPS coordinates with associated time stamp) during charging processes
- Charging statistics (e.g. start and end of the charging process, historical charging data, charging intervals or prices of the charging processes)

The data is retrieved via technical interfaces of the respective manufacturers or manufacturer apps. Due to the large number of brands and manufacturers, depending on the brand, we receive the data from the following service providers, who read out the aforementioned data and transmit it to us:

- Volkswagen Group Infos Services AG (Ungererstrasse 69, 80805 Munich, Germany)
- Enode AS (Inkognitogata 24C, 0256 Oslo Norway)
- High-Mobility GmbH (Markgrafenstrasse 35, 10117 Berlin, Germany)

We have concluded an agreement with the respective service provider for order processing in accordance with Art. 28 GDPR to continue to ensure the best possible protection of your personal data.

We collect the specified data based on your consent (Art. 6 (1) (a) GDPR). You give your voluntary consent during the app usage process by being referred to the respective service provider, where you can consent to the processing and transmission of your data.



## e. Contact and customer service

You have the option of contacting us by e-mail and sending us an enquiry. In this context, we process your name and contact details in order to contact you and process your enquiry.

We process personal data for the purpose of fulfilling the contract or providing the respective service (Art. 6 para. 1 lit. b GDPR).

## 5. chargeON recipients of the data

Within chargeON, those departments that need your data to fulfil their contractual and legal obligations will have access to it. External service providers used by chargeON may also receive data for these purposes. These may be companies in the categories of IT services, metering and billing services, and call centres. If necessary, data may also be passed on to other third parties such as debt collection agencies.

A collective list of charging processes carried out at home, at work and at public charging stations is sent to the employer (fleet manager) for reimbursement.

The external service providers have been carefully selected by chargeON and are bound by chargeON's instructions and are regularly monitored. chargeON will only pass on your personal data to third parties if:

- you have given your express consent (Art. 6(1)(a) GDPR),
- it is legally permissible and necessary for the performance of contractual relationships with you, e.g. to financial service providers (Art. 6(1)(b) GDPR),
- in the event that there is a legal obligation to disclose the data (Art. 6 (1) (c) GDPR), and
- the transfer is necessary for the assertion, exercise or defence of legal claims and there is no reason to assume that you have an overriding interest worthy of protection in the non-transfer of your data (Art. 6 para. 1 lit. f GDPR).

If necessary for the provision of our services, personal data will be transferred to the aforementioned locations within Switzerland and the EU. Where necessary, we conclude agreements on order processing in accordance with Art. 28 GDPR for the transfer of your personal data in order to continue to guarantee the protection of your personal data. Your personal data will be processed within the EU. If your personal data is nevertheless transferred to a third country, the requirements of Art. 44 ff. GDPR will be met in order to continue to maintain an adequate level of data protection by means of appropriate measures.

#### 6. Duration of storage

chargeON only stores your personal data for as long as is necessary to achieve the purposes stated here or as required by the statutory

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Special case: As long as the user agreement between the employee and chargeON and in the event of termination, chargeON will store the employee data until the final settlement of the charging processes carried out (final invoice). For tax purposes , chargeON generally deletes billing and reimbursement data ten years after reimbursement, with the period beginning at the end of the calendar year.

### 7. Data security

We take appropriate technical and organisational (Art. 32 GDPR) security measures to protect your personal data from unauthorised access and misuse.

## 8. Your rights

As a data subject, you have the following rights:

### Right to information

You have the right to obtain information from us about the processing of your personal data (Art. 15 GDPR).

In principle, requests for information are free of charge. A fee may be charged for excessive or notorious requests for information, provided that there is no legitimate interest. If you incur any costs, we will inform you in advance.

The exercise of these rights requires that you clearly prove your identity (e.g. by providing a copy of your ID card if your identity is otherwise unclear or cannot be verified). To assert your rights, you can contact us at the address given in section 1.

#### Right to rectification

You have the right to request that we correct any inaccurate or incomplete personal data concerning you (Art. 16 GDPR).

#### Right to erasure

You have the right to request the erasure of your data under certain conditions (Art. 17 GDPR). For example, you can request the erasure of your data if it is no longer necessary for the purposes for which it was collected. You can also request erasure if we process your data on the basis of your consent and you revoke this consent.

## Right to restriction of processing

You have the right, under certain conditions, to request a restriction of the processing carried out (Art. 18 GDPR).

### Right to data portability

You have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format (Art. 20 GDPR).

### Right to object to processing

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out on the basis of <a href="Article 6">Article 6</a>(1)(e) or (f) GDPR (Art. 21 GDPR).

## Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged



infringement, if you consider that the processing of personal data concerning you infringes this Regulation (Art. 77 GDPR).

#### Right of withdrawal

You have the right to withdraw your consent at any time with future effect. Please send your withdrawal to: <a href="mailto:privacy@autosense.ch">privacy@autosense.ch</a>

Please direct any enquiries to:

By email: privacy@autosense.ch

By post: autosense AG, Badenerstrasse 141, 8004 Zurich, Switzerland

Support: https://support.autosense.ch

#### **Changes**

We reserve the right to amend and supplement any part of this declaration at any time and at our sole discretion. The version published on our website (autosense.ch) shall apply in each case. We will inform you of these changes in an appropriate manner and in accordance with the requirements of applicable law.

If this statement forms part of the contract between you and us, we will inform you in advance and obtain your consent if we amend or supplement the statement to your disadvantage. Your consent is voluntary. If you do not agree with the relevant amendment or supplement, you can object to it. If you do not object within the previously announced period, this shall be deemed to be your consent to the relevant change or addition. A change or addition to this declaration does not entitle you to terminate a contract extraordinarily.

As of 1 December 2025