



Digital4grids Data protection policy

Digital4grids Data protection Policy

The following clauses have been design to ensure customer data protection according to the following 6 overarching principles :

1. Alignment with European Global Data Protection Regulation principles ;
2. All ingested data by default managed and protected on consumer behalf ;
3. Possibility to cancel or port data history upon request by email at aline.levallant@digital4grids.com ;
4. Open data portability towards flat .cnv or standardized IEC 62746-4 based formats ;
5. Possible real-time cloud data exports with explicit opt-in / opt-out consent management ;
6. Legitimate DER data access for energy, power & carbon footprint monitoring, flexibility baseline and offering calculations and energy price benchmark.

For any question regarding these clauses, send us an email at aline.levallant@digital4grids.com

The collection and processing of Personal Data, done when you use the Services provided by Digital4Grids, are carried out in accordance with Data Protection Legislation, inter alia, Regulation (EU) 2016/679 of the European Parliament and of the Council ("General Data Protection Regulation 2016/679" or "GDPR") as well as any other European or domestic regulations applicable in this field that may be added to or subsequently replaced by it (mentioned hereinafter as "Data Protection Legislation").

Your privacy and the protection of your Personal Data is very important to us at Digital4Grids ("Digital4Grids", "We", "Us" or "Our"). Accordingly, we have drafted the present Privacy Policy to explain Our policy with respect to data identifying or allowing to identify, directly or indirectly, a person using one or several specific elements ("Personal Data") including the measurements collected by Our connected solutions (the "Measurements"). Such Personal Data are either generated or collected by Digital4Grids or directly communicated by you when using any of the devices connected with Our Digital4Grids datahub (the "Product" or "Products"), Our Websites and more generally all URLs administered by Digital4Grids and its services (the "Website Services"), and Our software (the "Software", the "Computer Software" and "Mobile Software"). As used herein, the term "Services" means the Website, Website Services, Computer Software and Mobile Software.

The present Privacy Policy apply to any Personal Data processed by Digital4Grids through its Websites, Services and connected Products.

COMPLIANCE WITH DATA PROTECTION LEGISLATION

The collection and processing of Personal Data, done when you use the Services provided by Digital4Grids, are carried out in accordance with Data Protection Legislation, inter alia, Regulation (EU) 2016/679 of the European Parliament and of the Council ("General Data Protection Regulation 2016/679" or "GDPR") as well as any other European or domestic regulations applicable in this field that may be added to or subsequently replaced by it (mentioned hereinafter as "Data Protection Legislation").



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IDENTITY OF THE DATA CONTROLLER

When using the Services, all processing of Personal Data is carried out by Digital4Grids acting as a Data Controller:
Digital4Grids
45 Avenue Trudaine
75009 Paris Cedex,
France

ACCOUNT CREATION

To benefit from Our Services (use Our Mobile or Web Applications, contact Our Customer Service or get certified as a professional installer), you need to register by creating your personal account.

When doing so through Our Website or Our Mobile Software, you will be required to communicate an e-mail address and a password (hashed). Please note that both data are mandatory and essential for providing the Services that you requested. Failure to fill in a mandatory field will result in preventing the creation of your user account.

1. On the basis of the contract, We will process such data in order to create and manage your personal client account.
2. We may also process your e-mail address for communications, marketing and service support. For more information on this processing activity, please consult the [COMMUNICATIONS AND DIRECT MARKETING ACTIVITIES](#) section.

The data collected to create your account will be kept for the duration of the contractual relationship (that ends by sending a voluntary deletion request to aline.levaillant@digital4grids.com). We also inform you that, unless opposed by you, your account will be deleted if it remains inactive for 3 years. Note that you can review and edit your personal data and other information on Our Website.

For more information about the data recipients that benefit from an access to your personal data, please consult the ACCESS TO DATA section.

CONTACTING OUR CUSTOMER SERVICE

When contacting Our Helpdesk Support, We will collect the reason for contact and your message. Note that both data are mandatory and essential for providing the Services that you requested. Failure to fill in one of those field will compromise the proper handling of your request. Also note that you may attach and send Us a file to support your query. On the basis of the contract, We will process such data for the exclusive purposes of directing your request to the relevant internal teams and giving an answer to your query.

On the legal basis of the contract, we may where applicable and subject to your prior authorization, access your installation data (user account and associated Products data) for after-sales services purposes in order to diagnose and resolve a potential issue.

On the basis of Our legitimate interest in improving Our client relations, we inform you that we will retain your Helpdesk customer history.

The data collected by Our Customer Service is kept for a maximum of 6 years.

For more information about the data recipients that benefit from an access to your personal data, please consult the ACCESS TO DATA section.



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WEBSITE

Navigating On Our Website And Using Our Web-Applications : Cookies and Similar Technologies

When you browse the Digital4Grids Website, Cookies are placed on your browser. A cookie is a piece of information that the computer program which hosts Our Website gives to your browser when you access the Website. The cookies help provide additional functionality to the Website and help Us analyze Site usage more accurately. In some cases, you will be asked to provide prior consent before we use certain types of cookies. We recommend that you leave the cookies turned on or activated because they allow you to take advantage of some of the features on the Website.

The social plugins cookies allow you to interact with the following Social Media platforms:

1. Facebook / Instagram. You will find a list and an overview of Facebook social plugins at the following address: <https://developers.facebook.com/docs/plugins>. For more information on Facebook's policy with regard personal data protection, please refer to: <https://www.facebook.com/policy.php>
2. Twitter. For more information on Twitter's policy concerning personal data protection, please refer to: <https://twitter.com/privacy>
3. LinkedIn. For more information on LinkedIn's policy concerning personal data protection, please refer to: <https://www.linkedin.com/legal/privacy-policy>.
4. Youtube. You will find a list and an overview of YouTube social plugins at the following address: <https://www.youtube.com/yt/dev/>. For more information on YouTube's policy with regard to personal data protection, please refer to: <https://support.google.com/youtube/answer/2801895>

Audience Measurement Cookies

These cookies allow Us to obtain non-nominative statistics about Our Website to help Us optimize its ergonomics, content and navigation. Through the use of such cookies, Digital4Grids can only access the following categories of data: IP address, unique ID of cookie, information about the user's device and activities performed on the Website (first and last visit, length of visit, time of arrival and departure etc.).

If you consent to the deposit of such cookies, you can reconsider your decision and refuse the statistical analysis of your navigation data at any time by withdrawing your consent directly within the table.

For more information about the data recipients that benefit from an access to your personal data, please consult the ACCESS TO DATA section below.

DISCLAIMER - LINKS TO OTHER WEB SITES

The present Privacy Policy does not apply to Third-Party Websites. Although Our Websites may contain links to other websites, this does not imply that Digital4Grids endorses or has reviewed such Third-Party Websites that are not operated nor controlled by Digital4Grids. Please refer to the Third-Party Websites' privacy policies to obtain information as to how they

COMMUNICATIONS AND DIRECT MARKETING ACTIVITIES

Direct Marketing by E-mail

We may use your e-mail address to send you some product information, birthday offer propositions (if you decided to provide Us with this information), quizzes and commercial offer propositions.

Subject to your explicit consent, your e-mail address will be processed for the purpose of sending you offers, news bulletins, new products and promotional campaigns related to Digital4Grids services by e-mail.

Note that you can always oppose to this processing and unsubscribe from Our communications at any time by

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clicking the link at the bottom of Our e-mails or by following the procedure set out in the EXERCISE OF USERS' RIGHTS section.

Your e-mail address will be kept for the duration of the contractual relationship (that ends by sending a voluntary deletion request to aline.levaillant@digital4grids.com). We also inform you that, unless opposed by you, your account will be deleted if it remains inactive for 3 years. We inform you that We will process openings and clicks in order to assess the efficiency of Our campaigns on the basis of Our legitimate interest in improving Our communications.

For more information about the data recipients that benefit from an access to your personal data, please consult the ACCESS TO DATA section.

Your Digital4Grids may send you push notifications or alerts (For example, your platforms sends an alert to your mobile devices when a remarkable event occurs related to home energy and flexibility alerts). Note that you can disable and/or manage such notifications at any time directly from your account.

D4G API USERS

To get certified as a Digital4Grids API user, you need to register through Our Website in order to take Our online training tests.

When doing so, you will be required to communicate an e-mail address, name and surname. Please note that such data are mandatory and essential for registering as a Digital4Grids API users. Failure to fill in a mandatory field will result in preventing the creation of your API user account.

1. On the basis of the contract, We will process such data in order to create and manage your Digital4Grids API user account.
2. On the basis of Our legitimate interest in improving Our clients' relations, We will process such data in order to create of your personal file on Our CRM tool provided by Mailchimp.
3. We may also process your e-mail address for communications and direct marketing purposes. For more information on this processing activity, please consult the COMMUNICATIONS AND DIRECT MARKETING ACTIVITIES section above.
4. During the use of Our Services, We will collect your Test results (per product) on the basis of the contract and process such data for the purpose of giving you your professional certification.

The above data is kept for the duration of the contractual relationship (that ends by sending a voluntary deletion request to aline.levaillant@digital4grids.com).

For more information about the data recipients that benefit from an access to your personal data, please consult the ACCESS TO DATA section

You can exercise your rights by contacting: aline.levaillant@digital4grids.com. For more information about your rights under data protection legislation, please refer to the EXERCISE OF USERS' RIGHTS section.

PROFESSIONALS' OBLIGATIONS

As a Digital4Grids API user (certified professional), you are obliged to inform directly the end-users to read the Terms of Use and Privacy Policy available on the website, at the time of any Digital4Grids service deployment.

ACCESS TO DATA

We consider the privacy of your Personal Data to be a vital part of Our relationship with you. We hereby inform you that according to the Services that you are using, the following Data recipients have access to your personal data, within the limits of their respective assignments:

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1. The relevant internal departments of Digital4Grids, established in France:
 - 1.1. The Research and Development (R&D) teams in charge of our intelligent solutions have, in order to achieve their missions, access: to customer account data (email address only) (see section ACCOUNT CREATION), the information collected by the technical cookies necessary for the proper functioning of the Services (see sections Browsing Our Website And Using Our Internet Applications), data processed in connection with the use of the Services (see sections D4G Application)
 - 1.2. The teams of our customer support have, for the purpose of achieving their mission, access: to customer account data (see section ACCOUNT CREATION), data collected during your contacts with Technical Support (see section CONTACTING OUR CUSTOMER SERVICE), Account Data for Digital4Grids API Users (refer to section D4G API Users), to the data processed in connection with the use of the Products(see sections D4G Application)
 - 1.3. Our marketing teams have, for the purpose of achieving their mission, access to: customer account data (email address) (see section ACCOUNT CREATION), information collected by advertising cookies and measures (see section Browsing Our Website And Using Our Internet Applications), data collected as part of analytic profiling, data collected by our advertising identifiers
 - 1.4. Our online sales teams have access, for the purpose of carrying out their missions, to data transmitted by third-party cookies aimed at improving navigation, functionalities and user experience of the Website (consult section Browsing Our Website And Using Our Internet Applications)
 - 1.5. Our sales teams have access to D4G API User account data for the purposes of carrying out their assignments (see section D4G API Users)
2. The service provider Linode, whose data centers are located in the Germany, responsible for hosting the Digital4Grids's cloud architecture hosting all the data related to the Products and associated Services;
3. The platforms and social media: Facebook, Instagram, Twitter, LinkedIn and YouTube insofar as they have access to your browsing history on Our Website and Mobile Applications should you consent to such access. We also inform you that such platforms and social media benefit from a "Privacy Shield" certificate and as such, any potential transfer of your data for hosting and further processing purposes in the United States of America will take place under security and privacy conditions which are considered adequate according to European legislation.
4. Subject to your express consent, you may also decide to share your Personal Data or Measurements on other platforms such as social networking websites for example. In this case, you recognize that We do not own and have no control over these Third-party Partner Service Providers and that We are not responsible for data processing performed by these Third-party Service Providers. To learn more about the manner in which these Third-party Partner Service Providers process your Personal Data, we advise you to consult their applicable privacy policies.

We inform you that the aforementioned Data Recipients are bound by an obligation of confidentiality and may only process your data in compliance with Our contractual provisions and the applicable legislation.

5. You may decide to make your Personal Data or Measurements publicly available to other users and third parties on the Website.
6. You may also decide to invite other user(s) to control the Products that have been installed in your Home. To do so, your guests will be required to create their own personal account.
7. Digital4Grids may also be required to share your Personal Data if and when it is necessary in order to protect the vital interests of the data subject or of another natural person, if it is necessary for compliance with a legal obligation to which It is subject or for the establishment, exercise or defense of legal claims.



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8. Data Analysis: Digital4Grids can conduct Data Analysis on the Measurements collected by Its Platform. Such data will be rendered anonymous before any further use. Digital4Grids may then share this anonymized data with advertisers, researchers, business partners, publications, and other third parties for the purpose of performing statistics studies.

DATA SECURITY

Digital4Grids implements adequate physical, electronic and administrative protection measures that comply with the regulations to protect your Personal Data in particular from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

However, Digital4Grids would like to draw the users' attention to the potential risks in terms of data confidentiality linked to Internet use. It is the responsibility of the user to set up or ensure the use of a personal secured computer network, as well as to ensure a correct technical configuration of the connection box connected to your Internet service provider and of other devices such as radio access equipment (e.g. WIFI, 4G, etc.). Therefore, you should take special care in deciding what information you send to Us via e-mail and/or Internet transmission. Please keep this in mind when disclosing any Personal Data through the Website.

UNDER EIGHTEEN

When offering information society services Digital4Grids does not target minors under the age of 18 as a user group. Digital4Grids does not knowingly gather or use any personal information from children under 18. If information is gathered concerning a minor, the minor's legal representative has the possibility to contact the DPO of Digital4Grids at aline.levaillant@digital4grids.com in order to access, rectify, modify or delete this information (see section EXERCISE OF USERS' RIGHTS for more information).

However, access to the Services is not confined solely to adults as it contains no content prohibited for persons under the age of 18. The Services does not intentionally collect or use personal information relating to persons under the age of 18

EXERCISE OF USERS' RIGHTS

To keep your Personal Data accurate, current, and complete, please visit the My Account section of the Site. You may also contact Us as specified below.

We remind you that you have a right to access, rectify or delete your personal data. You can request that their processing be restricted or object to them being processed. When We rely on your consent to perform a particular processing, you can withdraw such consent at any time.

If you request the erasure, or object to the processing of data necessary to the performance of Our Services and/or specified as mandatory, you will no longer be able to use the Services, as they require the processing of these data to operate.

When a processing is carried out by automated means and based either on consent or on contract, you have the right to request the personal data that you provided to Us in an easily accessible format (portability right).

You may exercise your rights at any time, subject to the production of valid supporting documents, by sending your request to Digital4Grids's Data Protection Officer at aline.levaillant@digital4grids.com.

Your request will be processed within one month of receipt. If necessary, this period can be extended by two months, in view of the complexity and the number of requests. In this case, you will be informed of this extension and its reasons within one month of receipt of the request.

No payment will be required for the exercise of your rights except in case of manifestly unfounded or excessive demand. In this case, Digital4Grids further reserves the right to not respond to your request.

You also have the right to define guidelines for the fate of your data after your death.



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In the event you remain dissatisfied with Our response, We remind you that you have the right to lodge a complaint with the French data protection authority, Commission Nationale de l'Informatique et des Libertés (CNIL): <https://www.cnil.fr/>

AMENDMENT TO THIS DOCUMENT

The legislation may change, Our Website and other Services may evolve, we may rely on new service providers. As a result, Digital4Grids may need to make some changes to this Privacy Policy and reserves the right to update it or modify it at any time.

This Privacy Policy may be viewed on Our Website at any time.

ADDITIONAL CONDITIONS

Your access to and use of the Digital4Grids Services through the Websites are subject to their Terms of Use, available at <https://www.digital4grids.com>

DEFINITIONS

GDPR: General Data Protection Regulation

DPO: Data Protection Officer

Data Subject: an identified or identifiable natural person. In this Privacy Policy: an end user/ customer

Data Controller: a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data

Data Processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller

Data Recipient: a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not

Personal Data: any information relating to an identified or identifiable natural person