

Kaluza FLEX Privacy Notice

We take privacy seriously. This notice tells you who we are, what data about you we collect and what we do with it. Please read it carefully.

1. Introduction

Our mission at Kaluza is to drive the transition to an intelligent zero carbon energy system. We do this by enabling energy retailers and connected energy device manufacturers to power experiences that help customers to better understand their energy consumption and - where customers have the appropriate connected smart devices (like electric vehicles, home batteries and smart heating or cooling systems) - shift energy consumption to periods with lower cost and lower carbon intensity generation that are better aligned with the needs of the electricity grid.

Where we refer to “**Kaluza**”, “**we**”, “**us**” or “**our**” in this privacy notice we mean Kaluza Limited, a company registered in England and Wales, whose registered office is at 69 Notting Hill Gate, London, W11 3JS.

The responsible data controller is Kaluza Limited (12218299)

This privacy notice applies to your use of the Smart Charging Application, be that a web application or an application that can be downloaded (collectively the “**App**”) as installed onto your mobile telephone, tablet or other device (“**Device**”), that provides services relating to the charging of your connected energy devices (“**Connected Energy Devices**”) such as electric vehicles, home batteries, smart heating or cooling systems (the “**Services**”). Please also read any terms relating to the Service you are using. They provide more information about how we provide that Service, and any restrictions that may apply to the use of that Service.

2. How do we collect data about you?

We will collect personal data about you in the following ways:

- You may provide us with data directly (for example if you register an account with us, contact us via the App or send us an email) .
- We may collect data from third parties (for example from energy retailers who provide information to us in relation to your energy tariffs or from your Connected Energy Device manufacturer in order to deliver the Services).

3. What data about you do we collect?

We may collect various types of personal data about you when you access and/or use the Services, including:

Types of data we might collect from you	What this data covers
Identity and Contact data Data necessary to identify and contact you	<ul style="list-style-type: none">• Name• Email address• Address• Phone number• Any other relevant info we need in order to know that it's you and be able to contact you directly
Account data	<ul style="list-style-type: none">• Unique account number• Account login details (to enable linking with Energy Retail account)• Complaints and/or incident details• Account notes (e.g. in relation to troubleshooting, etc)
Profile and Consent Data	<ul style="list-style-type: none">• Your preferences (for marketing and other

	<p>notifications)</p> <ul style="list-style-type: none"> • The outcomes of user or market research you choose to participate in • Feedback, survey and market research responses you have provided to us about yourself and the context you use our products or services in (for example, your electric vehicle or your house). This may include photos, videos and audio recordings. • Partly anonymised analytical information about how you use the App
<p>Hardware Data</p> <p>Data relating to the Connected Energy Devices you use to access the Services</p>	<ul style="list-style-type: none"> • Your Connected Energy Device's location (GPS) • The make, model and registration of your vehicle • Your vehicle identification number • The login credentials for your Connected Energy Device • Various installation metadata such as house fuse rating, technical metadata/parameters of the connected energy device (power rating, etc) • Real-time power and energy readings from the Connected Energy Device and the house (in some cases) • Real-time status of the Connected Energy Device (e.g. plugged in/out/charging/boosting/etc) • Information relating to your solar system - system size, orientation and tilt
<p>Energy Data</p>	<ul style="list-style-type: none"> • Information about your energy retailer • Tariff • MPAN or Meter Serial Number and meter reference number, so that we can apply the right tariff • Energy usage (like meter readings and units of gas and electricity used over a period of time)
<p>Third-Party Account Data</p>	<p>Information relating to accounts you hold with third parties which allows us to link the Connected Energy Device you use to access our Services with your Connected Energy Device or energy retailer accounts, such as account identifiers or references.</p>
<p>Technical Data</p> <p>Data about the Device you use to connect to our Services</p>	<ul style="list-style-type: none"> • Your time zone • Region • IP address to enable us to tailor the user experience for your Device and to ensure we support the Device you want to use to access our Services • Which devices you use to access our services and websites • Operating system and platform
<p>Device Data</p> <p>Each time you use the App, it may automatically access from or store the following data to your Device</p>	<ul style="list-style-type: none"> • Technical information, including the Device's UDID (unique device identifier) • Model, Name and version of the operating system, • Preference settings, • Geography / physical location • If the App crashes information like the IP address of the Device, state of the Device, its type and time crash occurred to understand what went wrong.
<p>Log Data</p> <p>Details of your use of the App</p>	<ul style="list-style-type: none"> • Session duration • App opens • App updates • Button clicks

The App may also use your preference settings from your Device to provide you with push notifications. You may opt out of receiving push notifications by turning them off in your Device's settings.

4. For what purpose do we use data about you, and on what legal basis?

In this section, we describe the purposes for which we use your personal data and our legal basis for doing so.

We use data about you for the following purposes:

Purpose	Why
To provide our Services to you, such as smart charging of your electric vehicle via our App.	We will use your data on the basis of our contract with you to provide the Service.
To provide customer support services, including via the App.	We will use your data on the basis of our contract with you to provide the Service.
To generate analysis and insights relating to your use of our Services which allow us to improve our Services, including data relating to your usage of specific features of the Services, such as smart charging of your electric vehicle.	We may use your data on the grounds that we have a legitimate business interest to analyse the use of our Services, to improve our business service and performance.
To develop our products and Services, including on the basis of user research.	We may use your data on the grounds that we have a legitimate business interest to enhance and improve our products and Services, as well as to develop new products and services.
For security and authentication purposes, including the collection and processing of Device Data and Log Data.	This data is collected automatically through various means such as log processing and device monitoring. We use your data for these purposes on the basis that we have a legitimate business interest in ensuring the confidentiality, integrity and security of our digital infrastructure that is not overridden by your interests, rights and freedoms to protect data about you.
To comply with our legal obligations.	Where necessary, we will use your data to comply with our legal obligations.

Where we do not base our use of data about you on one of the above legal bases, we will ask for your consent before we process the data (these cases will be clear from the context).

In some instances, we may use data about you in ways that are not described above. Where this is the case, we will provide a further notice that explains such use. You should read any supplemental notice we provide alongside this notice.

5. The data we get from third party sources

We also get your personal data from the following third-party sources:

Third party sources	Types of data
Energy Suppliers	<ul style="list-style-type: none"> • Tariff • MPAN or Meter Serial Number and meter reference

	<ul style="list-style-type: none"> number, so that we can apply the right tariff Energy usage (like meter readings and units of gas and electricity used over a period of time)
Connected Energy Device Manufacturers	<ul style="list-style-type: none"> Your Connected Energy Device's location (GPS) The make, model and registration of your vehicle Your vehicle identification number The login credentials for your Connected Energy Device Various installation metadata such as house fuse rating, technical metadata/parameters of the connected energy device (power rating, etc) Real-time power and energy readings from the Connected Energy Device and the house (in some cases) Real-time status of the Connected Energy Device (e.g. plugged in/out/charging/boosting/etc)

6. Automated decision making

We monitor your electric vehicle usage habits, including how much you charge, how fast you charge, when and where you charge. This data is used to automatically plan and apply charging schedules to your electric vehicle when you are plugged in at your home charger.

7. Who do we share your data with, and for what purpose?

We may share data about you with:

Third-party	Description
Our third-party suppliers, partners and subcontractors	<p>They offer, review and/or receive services in relation to our website / app, services and/or products. They include</p> <ul style="list-style-type: none"> Suppliers of technical, support and installation services Logistics providers Security providers cloud service providers research agencies Market research agencies
Any company that's a member of OVO group	<p>OVO Group includes any of the companies listed at the top of this document. Plus, our businesses in the wider OVO Group such as OVO Energy, CORGI, Field Force, Kantan, and The Renewable Exchange, OVO Home Plan as well as other subsidiaries of OVO Group Limited from time to time.</p>
Your energy retailer/utility provider	<p>We may share</p> <ul style="list-style-type: none"> Aggregate data on how our app is being used so that we can explore new types of services we can offer to utilities Confirmation on whether a customer downloaded an app to understand engagement Aggregate data for the value created from shifting the consumption of energy Aggregated data on engagement levels within the app The nature of support queries from customers we have handled Aggregate data on where customers charge their EV

Connected Energy Device partners who provide access to your Connected Energy Device	To provide enhanced services such as discounted energy or rewards for the Services delivered with your Connected Energy Devices
Distribution system operators or electricity network operators	Who deliver the electricity network in your local area - to use the Services to support the electricity grid.
Transmission system operators or electricity market operators	Who help balance the grid on behalf of energy generators, electricity network companies and consumers - to use the Services to support the electricity grid.
Grid service partners,	Who provide aggregation or access services to the electricity network operators or electricity market operators - to use the Services to support the electricity grid.
Regulatory authorities, government departments and in response to a request from law enforcement authorities or other government officials	If we have good reason to think we've got a duty to do it, we'll give out your data to meet any legal obligation – where your data might be needed to meet national security or law enforcement needs, or to stop illegal activity.
Anyone who buys our business, any other business we buy or merge with, and/or a new data controller	If we sell or merge any of our businesses or assets, or if we do any internal reorganisations, your personal data might be one of the assets that goes to the buyer and/or new data controller. This includes transferring data to a potential purchaser for due diligence purposes before the purchase takes place.
A third party, such as police or legal representative	We would need to share your data with these third parties as part of enforcing our terms and conditions, or any other agreement. This might also happen when we're replying to any claims, or protecting the following: our rights, or the rights of a third party, or the safety of any person. We might also do this to stop any illegal activity.
Professional advisers	These advisers could be lawyers, bankers, auditors, and insurers who offer consultancy, banking, legal, insurance and accounting services.

8. Storing and transferring your data

Your personal data is kept for as long as it is necessary for the purposes for which it was collected. After this period your personal data is securely destroyed or anonymised. The period will vary depending on the purposes for which the data was collected.

We (or a third party who we share personal data with) might host, store, and handle that personal data outside of the UK or the European Economic Area (EEA). If we transfer personal data to a third party outside of the UK or EEA, we will, as required by applicable law, ensure that your privacy rights are protected by appropriate safeguards, such as the standard contractual clauses for the transfer of personal data outside of the EEA as approved by the European Commission or outside of the UK as approved by the ICO. If you would like more data about these safeguards, please contact us using the details in the "Who should you contact with questions?" paragraph below.

9. How do we protect data about you?

We implement appropriate technical and organisational measures to protect personal data that we hold from unauthorised disclosure, use, alteration or destruction. Where appropriate, we use encryption and other technologies that can assist in securing the data you provide. We also require our service providers to comply with strict data privacy and security requirements.

10. Your rights

You may have some or all of the following rights in respect of data about you that we hold:

- request us to give you access to it;
- request us to rectify it, update it, or erase it;
- request us to restrict our using it, in certain circumstances;
- object to our using it, in certain circumstances;
- withdraw your consent to our using it, in certain circumstances;
- data portability, in certain circumstances;
- opt out from our using it for direct marketing; and
- lodge a complaint with the supervisory authority in your country (if there is one).

The rights you have depend on the laws of your country. If you are in the UK or the EEA, you will have the rights set out above. If you are elsewhere, you can contact us (see the paragraph “Who should you contact with questions?”) to find out more.

Personal data may be exempt from the requests above, in certain circumstances. We could need to keep processing your personal data because of our interests, or to meet a legal obligation. If an exemption applies, we'll tell you when we reply to your request. We might ask you to give us some data to confirm your identity before we reply.

11. Who should you contact with questions?

If you have any questions, or wish to exercise any of your rights, please contact dataprotection.support@kaluza.com.

If you have a complaint or concern, please contact us in the first instance so that we can try to resolve the issue. You also have the right to contact the UK data protection authority, the Information Commissioner's Office, with any complaints or concerns. They can be reached at: <https://ico.org.uk/make-a-complaint/>. If we cannot resolve your questions or concerns, you also have the right to seek a judicial remedy before a national court.

12. Changes to this notice

We may update this notice (and any supplemental privacy notice), from time to time. We will notify you of the changes where required by law to do so.

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