



# Privacy Policy

Last updated: January 23<sup>rd</sup>, 2025.

## 1. Introduction

ChargeNet BV is committed to protecting your privacy and personal data. This Privacy Policy explains how we collect, use, process, and protect your personal information when you use our services as an e-mobility service provider for EV trucks in the European market.

This Privacy Policy applies comprehensively to all our data processing activities, including but not limited to our:

- **Website** and all associated web services,
- **SaaS platform** for location management and fleet operations,
- **Mobile application** on Apple iOS and Google Android for truck drivers accessing our EV truck charging network,
- **Business operations** including sales, marketing, customer support, and account management,
- **Employee & contractor data management**,
- **Recruitment & HR processes**.

ChargeNet BV acts as both a data controller (for data we determine the purposes and means of processing) and data processor (when processing data on behalf of our business customers). This policy covers our role as data controller unless specifically stated otherwise.

## 2. Data Controller Information

| Data Controller                                                                                                                                             | Data Protection Officer                                                                                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| ChargeNet B.V.<br>Westervoortsedijk 73<br>6827 AV, Arnhem, The Netherlands<br>Email: <a href="mailto:privacy@chargenet.energy">privacy@chargenet.energy</a> | Thijs Verwaal<br>CTO & Data Protection Officer<br><br>Email: <a href="mailto:dpo@chargenet.energy">dpo@chargenet.energy</a> |

## 3. Legal Basis for Processing

ChargeNet BV processes your personal data based on the following legal grounds under Article 6 of the GDPR:

- **Legitimate interests** (Article 6(1)(f)): For analytics, performance management, and debugging
- **Contract performance** (Article 6(1)(b)): For providing our services and support
- **Legal obligation** (Article 6(1)(c)): For HR compliance and legal requirements
- **Consent** (Article 6(1)(a)): Where explicitly obtained for specific purposes

## 4. Personal Data We Collect

ChargeNet BV collects various types of personal data as part of operating and maintaining our software products, technical integrations and internal operational processes:



#### 4.1 Website & Platform Analytics

- **Data collected:** IP addresses, browser information, device identifiers, usage patterns, page views, session duration, referring URLs
- **Purpose:** Performance management, analytics, and debugging
- **Legal basis:** Legitimate interests
- **Retention period:** 24 months

#### 4.2 Social Media Analytics

- **Data collected:** Engagement metrics, demographic information (where provided by platforms), interaction data
- **Purpose:** Performance management and analytics
- **Legal basis:** Legitimate interests
- **Retention period:** 24 months

#### 4.3 SaaS Platform User Analytics

- **Data collected:** Usage analytics, performance metrics, error logs, feature utilisation data
- **Purpose:** Platform optimisation, debugging, and performance management
- **Legal basis:** Legitimate interests and contract performance
- **Retention period:** Duration of service agreement plus 12 months

#### 4.4 Mobile App User Analytics

- **Data collected:** App usage analytics, performance data, crash reports, location data (when necessary for charging station access)
- **Purpose:** App optimisation, debugging, and service provision
- **Legal basis:** Legitimate interests and contract performance
- **Retention period:** Duration of service usage plus 12 months

#### 4.5 Sales & Support Operations

- **Data collected:** Name, email address, phone number, company information, communication records, support tickets
- **Purpose:** Customer relationship management, sales processes, customer support
- **Legal basis:** Contract performance and legitimate interests
- **Retention period:** 7 years after last contact

#### 4.6 HR Data

- **Data collected:**
  - **Employees:** Name, address, contact details, employment history, performance data, payroll information, benefits information
  - **Applicants:** Name, contact details, CV/resume, interview notes, assessment results
- **Purpose:** HR processes, employment management, legal compliance
- **Legal basis:** Contract performance, legal obligation, legitimate interests
- **Retention period:**
  - Employee data: Duration of employment plus 7 years
  - Applicant data: 12 months after application process



## 5. Third-Party Data Processing

ChargeNet BV works with trusted external partners for user account management and mobile app user data storage. These partners act as data processors under our instructions and are bound by data processing agreements that ensure GDPR compliance.

Key third-party categories:

- Cloud hosting providers
- Security services
- Analytics services
- Customer support platforms
- Payment processors (where applicable)
- HR management systems

All third-party processors are selected based on their GDPR compliance and security standards.

## 6. International Data Transfers

When ChargeNet BV transfers personal data outside the European Economic Area (EEA), we ensure adequate protection through:

- European Commission adequacy decisions
- Standard Contractual Clauses (SCCs)
- Binding Corporate Rules (where applicable)
- Certification schemes

## 7. Data Security

ChargeNet BV implements appropriate technical & organisational measures to protect your personal data, including:

- Encryption of data in transit and at rest
- Access controls and authentication systems
- Regular security assessments and updates
- Staff training on data protection
- Incident response procedures

## 8. Your Rights Under GDPR

You have the following rights regarding your personal data:

### 8.1 Right of Access (Article 15)

You can request information about the personal data we process about you.

### 8.2 Right to Rectification (Article 16)

You can request correction of inaccurate or incomplete personal data.



### 8.3 Right to Erasure (Article 17)

You can request deletion of your personal data in certain circumstances.

### 8.4 Right to Restrict Processing (Article 18)

You can request limitation of processing in specific situations.

### 8.5 Right to Data Portability (Article 20)

You can request transfer of your data in a structured, machine-readable format.

### 8.6 Right to Object (Article 21)

You can object to processing based on legitimate interests or for direct marketing.

### 8.7 Rights Related to Automated Decision-Making (Article 22)

You have rights regarding automated decision-making and profiling.

### 8.8 Right to Withdraw Consent

Where processing is based on consent, you can withdraw it at any time.

To exercise your rights, contact us at: [privacy@chargenet.energy](mailto:privacy@chargenet.energy).

## **9. Data Retention**

ChargeNet BV retains personal data only for as long as necessary to fulfil the purposes outlined in this policy or as required by law. Specific retention periods are detailed in Section 4 above.

## **10. Cookies and Tracking Technologies**

ChargeNet BV's website and applications use cookies and similar technologies. For detailed information about our cookie usage, please refer to our separate Cookie Policy.

## **11. Marketing Communications**

We may send you marketing communications about our services. You can opt out at any time by:

- Clicking the unsubscribe link in emails
- Contacting us directly
- Updating your preferences in your account settings

## **12. Data Breach Notification**

In case of a personal data breach that poses a risk to your rights and freedoms, we will notify you within 72 hours of becoming aware of the breach, as required by GDPR.



## 13. Children's Privacy

ChargeNet BV's services are not intended for nor directed to children under 18 years of age. We do not knowingly collect personal data from children under 18.

## 14. Supervisory Authority

You have the right to lodge a complaint with your local data protection supervisory authority if you believe we have not complied with data protection laws.

### **Netherlands Data Protection Authority**

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Autoriteit Persoonsgegevens  
Bezuidenhoutseweg 30  
2594 AV, The Hague, The Netherlands  
Website: [autoriteitpersoonsgegevens.nl](https://autoriteitpersoonsgegevens.nl)

## 15. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. We will notify you of any material changes by posting the new policy on our website and updating the "Last updated" date.

## 16. Contact Information

For any questions about this Privacy Policy or our data processing practices, please contact us:

| <b>Data Controller</b>                                                                                                                                      | <b>Data Protection Officer</b>                                                                                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| ChargeNet B.V.<br>Westervoortsedijk 73<br>6827 AV, Arnhem, The Netherlands<br>Email: <a href="mailto:privacy@chargenet.energy">privacy@chargenet.energy</a> | Thijs Verwaal<br>CTO & Data Protection Officer<br><br>Email: <a href="mailto:dpo@chargenet.energy">dpo@chargenet.energy</a> |

*This Privacy Policy is effective as of January 1<sup>st</sup>, 2025 and applies to all personal data processing activities by ChargeNet BV.*