

Data protection declaration

smart-me AG

Smart-me AG (henceforth “smart-me”) respects the privacy of every person who uses the smart-me devices, visits the smart-me website or uses the smart-me cloud functions. If you use smart-me services, you entrust us with your data. You can use this in a variety of ways - to monitor, visualize, control and bill energy flows. By agreeing to this data protection declaration, you agree that your meter data may be stored and processed in the smart-me cloud. In this data protection declaration you will find out which data we collect, for what purposes we collect the data and what we do with the collected data. The security of your data is therefore our top priority. Our privacy policy explains:

- How we protect your data
- What information we collect for what reason
- How we use this information
- The choices we offer, including how information can be accessed and how it can be updated.

The protection of your data is important to smart-me and therefore we ask you, regardless of whether you are a new or long-standing user, to take the time to get to know our practices - if you have any questions, please contact us.

How we protect your data

Encryption

Every access to your data in the smart-me cloud is SSL (TLS) encrypted. All access attempts are logged and analyzed. Passwords and other sensitive data are only stored in encrypted form. All connections between the devices (meters, modules, e-charging stations and gateways) and the smart-me cloud are encrypted. Each device has its own unique key (128 bit). AES is used as the algorithm.

Make an active contribution to the even more secure protection of your data by encrypting your WiFi network with a strong password.

Access security

The measurement data of the various devices (e.g. electricity meters) of the user are recorded in the smart-me cloud and processed further in anonymised form. The user also has the option of making his measurement data visible to other users. The smart-me servers are located in secure data centers in Switzerland and are only accessible to authorized personnel.

Information We Collect

We collect information to provide better services to all of our users - from determining basic issues such as the language you speak to more complex issues such as energy consumption (electricity, water, gas, heat). We collect information in the following ways:

Visiting the smart-me websites

You can visit our website without having to provide any personal information. We save your access data without personal reference.

Log data

However, when you access content provided by smart-me, we collect and save certain data in server logs. These logs include, among other things:

Details on the way in which you have used our services, for example the pages you have visited on smart-me.com

IP address

Data on device events such as crashes, system activity, hardware settings, browser type, browser language, date and time of your request and referral URL

Location related information

Local storage: We may collect and store information (including personal data) locally on your device using mechanisms such as your browser's web storage (including HTML 5) and application data caches.

Cookies and Similar Technologies

We and our partners use various technologies to collect and store data when you call up a smart-me service. This may also include cookies or similar technologies that are used to identify your browser or device. You can prevent the installation of cookies by setting your browser software accordingly; however, we would like to point out that in this case you may not be able to use all functions of this website to their full extent.

Analysis

In order to enable a statistical analysis of usage behavior, smart-me uses analysis services and tracking technologies from [Google, Mountain View, California, United States](#). The data collected in this way are anonymized. Only how smart-me products are used is recorded, e.g. page views and loading times, but never personal or customer-identifying data or content. The data collected in this way are used exclusively for troubleshooting and optimize the customer experience. The information generated is usually transmitted to and stored by Google on European servers (to enable performance comparisons). You can find more information about Google's privacy policy [here](#).

Cloudflare

To secure the smart-me server and optimize loading times, CloudFlare is used as a CDN ("Content Delivery Network"). Therefore, all requests are forcibly routed through the CloudFlare server and consolidated into statistics that cannot be deactivated. According to

the company, the collected raw data is usually deleted within 4 hours, at the latest after 3 days. [Here](#) you will find information about the data collected there and about [security and data protection at CloudFlare](#). Cloudflare also works within the framework of the Privacy Shield Agreement between the EU and the USA.

Contact forms

If you use the contact and registration forms offered on our website, you should not enter any sensitive or particularly sensitive data. Information that is transmitted over the Internet (such as online forms) and content received online may, under certain circumstances, be transmitted via third-party networks and be visible to everyone.

Use of the smart-me web portal and the smart-me app

Data you share with us

To use the smart-me cloud services, you must first create a smart-me account. For this we ask you to provide personal data. This is at least your e-mail address that will be saved.

Data that we receive due to your use of our services

Device-related information: The meter data recorded in your smart-me account (electricity, water, gas, heat, etc.) are saved in relation to the email address you provided.

By using the smart-me cloud services, which require consent to this data protection declaration, you also agree that smart-me may inform you about all innovations, all changes, restrictions or changes necessary for the proper operation and effective use of the portal Extensions informed. You can withdraw your consent at any time.

Customers of service providers who use smart-me

If your smart-me account is managed for you by an energy billing service provider, the billing service provider and the sales partners who provide customer service for your organization have access to the information on your smart-me account (including your e-mail address and your meter data). Your measurement data can and will be viewed by the creator of the energy bill. In any case, the total energy consumption is recorded by the creator of the energy cost bill at the end. This is done on the basis of our instructions and in accordance with our data protection declaration and other appropriate confidentiality and security measures.

Your utility or energy service provider may have the option:

- View statistics related to your account
- block or terminate access to your account
- access or store data stored as part of your account
- To receive information from your account in order to comply with applicable laws, regulations or applicable procedural law or to comply with an enforceable official order
- Limit your ability to delete or edit data or privacy settings

For more information, please refer to the data protection declaration of your utility or energy service provider.

If you would like to prevent your energy billing center from viewing your energy data in detail, please contact smart-me and your billing center. Under certain circumstances (e.g. due to contractual ties in a self-consumption community) a suitable follow-up solution for billing your energy data must be found.

General business software

We process the data you provide exclusively to fulfill and process your order as well as for the purpose of using the smart-me cloud, for advice, for advertising and market research for our own purposes and to tailor our services to your needs. Your personal data will only be collected for specified, clear and legitimate purposes and will not be stored longer than necessary.

Emails

In every e-mail from us you have the option to unsubscribe from further product information or e-mails. Exceptions are those e-mails that are necessary for the customer relationship or its termination, e.g. updating of our general terms and conditions. We use systems from [Mailchimp Inc, Atlanta, Georgia, United States](#) to send e-mails. Your first name, last name, country, language, company and, if necessary, information on your customer segment are transmitted to Mailchimp for processing. You can find more information about Mailchimp's data protection guidelines [here](#).

Transactional emails (such as order confirmations) are sent via the US service provider [SendGrid](#). Shipping via a specialized service provider is required here to guarantee the delivery of the e-mails and, if possible, also to reduce the probability that these e-mails will be classified as "spam". An adequate level of data protection is guaranteed at all times. SendGrid does not store any message content, only data for sending e-mails, and the storage is limited in time. You can find out more about Sendgrid's data protection guidelines [here](#).

Enterprise Resource Systems

In order to use third-party technical or organizational services that we need for our business activities, personal data can be stored in third-party systems. For example, surname, first name, company, language, address, information on the customer segment and bank details in our business software from [bexio AG, Rapperswil, Switzerland](#). You can find more about the data protection guidelines of bexio AG [here](#).

Customer Support

To provide customer support, smart-me uses the systems from [Freshworks Inc., San Mateo, California, United States](#). So that smart-me can help you optimally, the following information is stored exclusively for the purpose of support services: Name, first name, company, delivery address, email, serial number, product type, language, telephone number. smart-me stores the exchange between you and our customer support regardless of how we communicate with you (phone, email, etc.). This in order to be able to better support you with future inquiries. Questions that are asked via the Apple App Store, the Google App Store or social media (such as LinkedIn or similar) also trigger a Freshworks ticket and are saved. The data stored in this way are stored in accordance with the applicable data protection regulations. You can find more information [here](#).

Payments

We process payments via Stripe and PayPal, among others. In this respect, your data will be passed on to them. As part of the payment process via PayPal, you will be directed to the PayPal website. You only enter your confidential data on the payment provider's website. There is then a secure connection there. You can find out more about the security of payment transactions from [PayPal](#) or [Stripe](#).

Google Workspace

We use business tools from Google Workspace ([Google, Mountain View, California, United States](#)). We also store personal data in it, for example email addresses. You can find out more about the data protection guidelines of Google Workspace [here](#).

Access and update your personal information

Whenever you use our services, we aim to give you access to your personal data. If this data is incorrect, we will endeavor to give you the opportunity to quickly update or remove it - unless we need to keep this data for legitimate business or legal purposes.

We strive to provide our services in a way that protects the data from accidental or willful destruction. For this reason, we may not immediately delete remaining copies of data that you have deleted from our services from our active servers and do not remove this data from our backup systems. Please contact us by post or email if you would like information, correction, blocking or deletion of your stored data free of charge.

Safeguarding the public interest

We will pass on personal data to companies, organizations or persons outside of smart-me if we can assume in good faith that access to this data or its use, storage or disclosure is reasonably necessary in order to

- Comply with any applicable law, regulation, or legal process, or comply with an enforceable governmental order
- Enforce applicable Terms of Use, including investigating possible violations of fraud, security flaws, or technical issues, detecting, preventing, or otherwise combating
- To protect the rights, property or safety of smart-me, our users or the public from harm, to the extent permitted or required by law

In the event of a company restructuring

If smart-me is involved in a business combination, a company acquisition or a sale of assets, we will continue to ensure the confidentiality of all personal data and we will notify users concerned before personal data is transmitted or the subject of another data protection declaration.

Scope of the data protection declaration

Our data protection declaration applies to all services offered by smart-me and its affiliated companies, including eCarUp. This date

The protection declaration does not apply to services for which separate data protection declarations apply, which do not include this data protection declaration.

Our data protection declaration does not apply to services offered by other companies or persons that may contain smart-me services or other websites linked to our services. Our privacy policy does not cover the handling of information by other companies or organizations that advertise our services.

Working with regulators

We regularly check compliance with our data protection declaration. Your customer data will be stored, processed and passed on in compliance with the relevant provisions of Swiss legislation (Federal Data Protection Act), Federal Data Protection Acts (BDG) and the EU General Data Protection Regulation (GDPR). The responsible supervisory authority is the Federal Data Protection and Information Commissioner.

Changes

Our privacy policy may change from time to time. We will not restrict your rights under this data protection declaration without your express consent. We will publish all changes to the privacy policy on this page. If the changes are material, we will provide an even clearer notification (including, in the case of certain services, an email notification of the changes to the privacy policy). We will also keep older versions of this data protection declaration in an archive for your reference.

Responsible for data protection

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