

Global Policy Owner: Gard Pettersen Approved: Sjur Hjelle

#### 1. Summary

Pixii AS (also referred to as the "Provider" or "we") provides advanced energy storage solutions and services consisting of an Internet of Things "IoT" platform that allows the end user (also referred to as "User" or "you") to monitor and control your Pixii energy storage solution, either locally, via the Internet through a web app or mobile applications. The services also provide Pixii with the ability to configure and perform service and support on your Pixii energy storage solution. It is important to us at Pixii that you know what information we process about you when you visit our websites or purchase and use our products and services, and that you feel confident that your privacy is well taken care of. This privacy policy provides you with information about the personal data collected, why we collect it, how it is processed, and your rights related to processing your personal data. The Provider is committed to protecting your personal data when using our websites and services. Since Pixii is established in the European Economic Area (EEA), our collection and processing of personal data are subject to the General Data Protection Regulation (GDPR), regardless of where you reside or where the data is stored or processed.

# 2. What does this Privacy Policy cover?

This Privacy Policy covers personal data about you that we collect and your rights in relation to that data. We may collect personal data when you:

- Visit one of our websites
- Purchase from us
- Use our products and services
- Communicate with our sales or support team

This Privacy Policy is not part of a contract with you. Its primary purpose is to ensure you have up-to-date and accurate information about how we collect and use personal data. Therefore, we may change this Privacy Policy at any time. We will notify you of material changes to this Privacy Policy in accordance with applicable laws and regulations.

#### 3. Who is the Controller?

Pixii AS with organization number 920 652 964 and business address Andøyfaret 33, 4623 Kristiansand S, NORWAY (the "Provider"), through the CEO, is responsible as the Controller for all processing of personal data carried out through the service and on the Pixii websites. Day-to-day follow-up of compliance with the regulations lies with the Data Protection Coordinator at the Provider. For questions you may have about Pixii's processing of your personal data, you can contact the Data Protection Coordinator by sending an email to post@pixii.com. Sometimes, we may work with third parties to collect and process personal data. You can read more about these in sections 4, 6, 8, 9, and 10.

#### 4. What personal data is collected?

The personal data we collect and process about you depends on your relationship with us. If you are a customer or a User of our products or services. In that case, we will collect and process the personal data you provide to us, and we are likely to automatically collect personal data when you use or interact with our services. Please note that registering personal data is not mandatory when using enterprise systems,

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but it may be required for some features, such as notifications or Pixii Cloud. When you use one of our websites, Pixii will sometimes collect and process personal data about you.

#### Personal data you provide to us may comprise:

- Contact information: Your name, email address, physical address, phone number or other contact information
- Account data: Account ID (email address), user credentials, app identifier
- Communication data: Communication with us, such as our sales or customer service functions.
   This can also include interactions with our social media accounts or other parts of the Pixii organization
- Payment data: Payment methods and billing address
- Purchase data: Data about your acquisition of our goods or services, along with data gathered for executing or finalizing a contract
- Other data you provide to us: You may provide data to us with data from time to time when you
  participate in events or campaigns, as a shareholder or as a potential business partner

# Data we collect when you use or interact with our products and services:

- System data: Data about your Pixii system(s), such as serial number, physical locations, MAC address, and hardware information such as component version
- Usage data: Active services, battery charge cycles, ambient temperature, system temperatures, maintenance status, performance data, system logs and other diagnostic data
- Other technical data: Data about the interaction of your apps, browsers, and devices with our services and systems, including IP address, user credentials, and system activity
- Behavioral and preference data from our websites

# Data we collect from third parties:

- Our mobile applications are listed in Apple's App Store and Google Play store. You must have an
  active Apple ID or a Google account to download the apps. The collection and processing of your
  personal data from these third parties are covered in section 10
- We may occasionally receive or collect personal data from public sources when relevant to legal proceedings

# 5. Basis for processing

We may process personal data about you for different purposes depending on your relationship with us. If you are a customer or a user of our products and services, typically, we may process information to:

# Deliver our products and services to you

Pixii will use personal data about you as necessary for us to provide the products and services as intended.

The processing activities include, but are not limited to:

- Processing orders and payments
- Delivery of physical products
- System installation and commissioning

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- Enable you to use our Apps and other software services
- Provide you with notifications such as order confirmation
- Resolve bugs and other issues and problems you may encounter when using our products/ services
- Respond to and resolve disputes
- Process returns

# Provide you with customer support

Our Customer Success team manages support tickets and inquiries, which may include your personal data, to resolve issues and fulfill information requests. Other departments may assist in customer support as needed. We may use your personal data from support tickets for staff training purposes.

# Improve our products and services

We may use personal data to improve our products and services. To perform our contract with you, we may occasionally process personal data about you to resolve bugs, technical issues, or other types of issues you or other customers reported.

On occasion, we may ask you to participate in surveys. If you are asked to participate in surveys, you will be provided with more information about how we process survey data.

### Market our products and services

We may use personal data to market our products and services to you. This includes sending newsletters or promotional content about Pixii and our products and services.

# Prevent fraud and abuse

Pixii uses personal data to prevent fraud and abuse related to your Pixii system, account, and our products and services.

# Manage risk and business development purposes

We may process your personal data to monitor our business performance and protect our rights by preserving evidence and enforcing claims. In the event of a business sale, we may exchange and process personal data about you with the acquiring party.

#### 6. What is the legal basis for processing personal data?

In some cases, Pixii has a statutory obligation to process your personal data. In that case, the basis for processing your personal data will be required by law. This is relevant in cases where Pixii must store certain personal data, such as bookkeeping, customer control, investigation, and reporting under the Money Laundering Act. We are obliged to comply with the Norwegian Sale of Goods Act, the Accounting Act, and other national acts that are valid and binding in the countries in which we operate. You may give voluntary, explicit, and informed consent to us using your contact information to send you SMS notifications and other important details by SMS and email notifications. Consent as a basis for processing applies when the purpose of processing the personal data falls outside what is necessary to fulfill the agreement with you or administer you as a User.

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Please note that you are not required to provide the personal data we request. However, we may not be able to provide you with our products and services or respond to your requests if you choose not to do so. This especially applies to the processing necessary to perform our contractual obligations with you.

# 7. How long does Pixii store personal data about you?

We store personal data for as long as is necessary for the purpose for which the personal data was collected.

This means, for example, that personal data that we process based on your consent will be deleted without undue delay if you withdraw your consent. Personal data we process to fulfill an agreement with you will be deleted when the agreement is fulfilled, and all obligations arising from the contractual relationship are fulfilled. However, personal data will be stored for as long as necessary to fulfill the purpose of the processing or statutory obligations of Pixii.

# 8. Third-Party Services - Disclosure of Personal Data

You may integrate third-party services ("Third-Party Services") into our products and services. Providers of such Third-Party Services should have their Privacy Policy. Although the Provider may, at your request, share personal data with such third parties, Pixii is not responsible for Third-Party Services. We recommend you familiarize yourself with the Privacy Policy and Terms of Use of Third-Party Services.

#### 9. Disclosure of personal data to others

Pixii does not disclose personal data to others unless there is a legal basis for such disclosure. Examples of such a basis will be an agreement with you or a legal obligation requiring us to disclose the information. Personal data disclosure may also occur in connection with a business transfer, merger, acquisition, or division of our business.

Pixii will never sell or give away your personal data to third parties without your consent other than those explicitly mentioned in this Privacy Policy or the Terms of Use.

# 10. About the Pixii's suppliers

Pixii has subcontractors who may process your personal data on our behalf, acting as "Data Processors". When required by applicable law, we will enter into Data Processing agreements with these subcontractors. Please note that some subcontractors may also process your personal data as independent controllers for their legitimate interests. We encourage you to review their privacy policies before using any products or services provided.

We have provided a list of some of our subcontractors and a brief description of their roles. Please note that this list may not be exhaustive and is subject to change. Any changes to our subcontractors will be made in accordance with applicable laws and regulations.

# DigtalOcean and Thingsboard

Part of Pixii's cloud service is based on DigitalOcean and Thingsboard. The cloud service is encrypted end-to-end. The Provider also uses a pre-shared generated encryption called public key encryption. The servers are located in Europe, and personal data is not transferred outside the EU/EEA. DigitalOcean processes personal data stored in the cloud service if you have services that require processing personal

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data or choose functions in the application that require processing personal data. All services that include notification via e-mail and SMS require that the Provider processes personal data.

#### **Amazon Web Services (AWS)**

Part of Pixii's cloud service is based on AWS. The cloud service is encrypted end-to-end. The Provider also uses a pre-shared generated encryption called public key encryption. The servers are located in Europe, and personal data is not transferred outside the EU/EEA.

# **Google Cloud**

Part of Pixii's cloud service is based on Google Cloud. The cloud service is encrypted end-to-end. The Provider also uses a pre-shared generated encryption called public key encryption. The servers are located in Europe, and personal data is not transferred outside the EU/EEA.

#### Remote.it

Part of Pixii's cloud service is based on remote.it. The cloud service is encrypted end-to-end. The service is a P2P and proxy solution to provide remote access for configuration. The IP address is stored. Remote.it process personal data stored in the cloud service if you have services that require processing personal data. This applies to email addresses and names. The service may be deactivated upon request to Pixii, but deactivation may reduce the warranty period.

#### Mender.io

Part of Pixii's cloud service is based on Mender.io. The cloud service is encrypted end-to-end. The service is used for system updates. The IP address is stored. The service may be deactivated upon request to Pixii, but deactivation may reduce the warranty period.

# Charterers

When you purchase products from us, we may transfer personal data to the charterer, who will deliver the product. Which charterer this is depends on the type of shipping you have chosen. The chosen charterer will also communicate directly with you about delivery.

# **Apple App Store**

Our mobile applications are available for download through Apple's App Store for supported devices. The App Store is owned and operated by Apple Inc., and when you download one of our apps through this platform, you may be required to provide personal data to them. The collection, use, and disclosure of your personal data on the App Store is subject to Apple's Privacy Policy.

# **Google Play Store**

Our mobile applications are available for download through the Google Play Store for supported devices. The Play Store is owned and operated by Google LLC, and when you download one of our apps through this platform, you may be required to provide personal data to them. The collection, use, and disclosure of your personal data on the Google Play Store is subject to Google's Privacy Policy.

# **Google Analytics**

We use Google Analytics to enhance the browsing experience and analyze website traffic. This takes place when you visit our sites and is optional. Please see our Cookie Policy for details on our cookie usage.

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#### **Google Firebase**

We use Google Firebase for our mobile applications for Android. It collects and processes installed application identifiers for the purpose of sending push notifications and providing remote configuration for the applications. Google Firebase also collects crash reports, where personal data may be included, that we use to improve our application. Please see Google's Privacy Policy for more information about Google Firebase.

# **HubSpot**

We use HubSpot, a customer relationship management platform, to manage and analyze our interactions with users. HubSpot provides us with a suite of services, including marketing, sales, content management, customer service, and commerce tools. These tools help us understand user behavior, improve our website functionality, and enhance user experience.

Using cookies and other technologies, HubSpot collects user behavior and device data. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our websites. HubSpot stores this information on our behalf in a pseudonymized user profile. HubSpot is contractually forbidden to sell any data collected on our behalf. The use of these cookies is entirely optional, and you can choose to accept or decline cookies. For more information, please see our Cookie Policy.

For more information, please see HubSpot's privacy policy.

#### **Facebook**

Some of our websites use cookies from Facebook to deliver advertisements when users are on Facebook or a digital platform powered by Facebook advertising after visiting. Please see our Cookie Policy for details on our cookie usage.

The use of these cookies is entirely optional, and you can choose to accept or decline cookies. For more information, please see our Cookie Policy.

#### 11. Your rights

As a data subject under the Norwegian Personal Data Act and the EU General Data Protection Regulation (GDPR), you have certain rights to your personal data for which Pixii is the Controller. You have the right to demand access, correction, or deletion of the personal data the Provider processes about you. You also have the right to demand limited processing and object to the processing. Under the terms of the Norwegian Personal Data Act and GDPR, the data subject also has the right to demand data portability, and this means, among other things, that you can ask us to transfer personal data to you or another Controller.

You also have the right not to be subject to a decision based solely on automated processing that produces legal effects for or similarly significantly affects you. In some cases, you can ask us to restrict the processing of personal data.

Questions or requests for access to information registered about you or the exercise of other rights can be directed to Pixii's Data Protection Coordinator.

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To exercise your rights, please email Pixii's Data Protection Coordinator. We will respond to your inquiry as soon as possible and within 30 days at the latest.

You can read more about the content of your rights as a data subject on the Norwegian Data Protection Authority's website, datatilsynet.no.

# 12. Contact us

You can contact the Provider:

Mail: Pixii AS, Postboks 1618 Vika, 0119 OSLO, Norway

Email: post@pixii.com

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