

Privacy Policy

Preamble

“HELLENIC PETROLEUM PROVISION OF ELECTROMOBILITY SERVICES SINGLE MEMBER SOCIETE ANONYME”, which uses the discrete title “ElpeFuture” (hereinafter referred to as the **“Company”**), takes a responsible stance towards the protection of personal data and privacy and believes it to be an issue of supreme importance and is committed to handling your personal data responsibly and in accordance with the applicable national and European legislative and regulatory framework on the protection of personal data. By determining the purposes and means of the processing of personal data, the Company becomes controller of said data.

1. Subject

This Privacy Policy describes how the Company processes your personal data when you sign up to the Application and use its services. By using the Application or any other feature or content that the Company offers from time to time in relation to its software or applications, it is presumed that you accept the practices and policies described in this Privacy Policy. If you do not accept the policies and practices described herein, it is recommended that you do not proceed to browse through, register to, or use the Application in general. The Company reserves the right to modify and adjust this Policy whenever necessary. Your continued use of the Application after any amendment to this Policy shall be construed as acceptance of such amendments.

This Policy does not apply to third party applications or to data provided by you to third parties or collected by third parties. Said third parties may have their own privacy policy, which you are encouraged to read before disclosing data to or through them.

2. Data collected by the Company

Provision of information to users regarding the nearest ElpeFuture charging points

When you use the geolocation and navigation services to receive information through the Application on the location and details of the nearest ElpeFuture charging point and to receive information on promotions offered by ElpeFuture near you, the processing of your location data is done via GPS by the Google Maps application, and your consent is requested for activation of the geolocation function on your device and the receipt of promotional material.

For your information, the Company processes information via GPS and as regards the use and collection of your personal data for the provision of geolocation and navigation services, it is done by Google through the Google Maps application. For more information on how Google handles your personal data, it is recommended that you refer to the Privacy Policy of that application by visiting the following website: <https://policies.google.com/privacy?hl=en>

Registration

When you register to create your account, the Company **collects from you** and processes the following personal data:

- name
- surname
- email address
- phone
- password
- information disclosed via the use of social media through add-ons. If the user connects to the Application through a social networking website (Facebook, Twitter, Google) and in this way consents to the Company accessing that page, the Company collects the personal data to which it may have access depending on the user's privacy settings or the privacy policy of that particular social networking website. However, social network add-ons and similar technologies are controlled by the social networks themselves and are subject to the terms of use and privacy policies of the networks themselves.

ElpeFuture Card

As part of the “**ElpeFuture Card**” feature, and aside from the data collected for identification of the user, the Company collects **from the user** the number of any Card entered by the latter.

Furthermore, the Company **creates** the following data on the user based on the aforementioned information:

- A transaction history and details regarding said transaction, such as the name of the charging point and the date and value of the transaction. This data is automatically collected by the Company from the points of sale where the user used the Card entered to purchase EV charging services.
- Statistics regarding the user's transactions, such as the value of transactions, energy consumption (kWh) and the products most often purchased.

Payments

As part of the “**Payments**” feature, and aside from the data collected for identification of the user, the Company collects from the user the number of the ElpeFuture Card and credit/debit card information (card type, credit card number, name on the card, expiration date), if the user chooses to provide this information and make use of the feature. Billing information (such as the name of the user, the number and expiration date of the credit/debit card) is collected for the purpose of carrying out and completing transactions and purchases made through the Application and is stored in the Application.

Promotional and Information Material - Personalized offers

In order to send promotional and information material on behalf of the Company or on behalf of other companies and provided that the user has granted consent for the specific processing, the Company will use the e-mail address provided **by the user**. The user may revoke his consent through the Profile settings of the Application.

Data collected automatically

Each time the user interacts with the Application's services, data may be automatically received and recorded in the server's log files from the user's device platform, including:

- a) usage data, i.e. data related to the access to and use of the services, your interactions via email, and text messages you may receive from the Company, including traffic data, log files and other communication data;
- b) device identification data and device and software features, i.e. information regarding the mobile device and Internet connection, including the unique device identifier, the IP address, the operating system, the browser type, mobile network information, the telephone number of the device;
- c) if the user gives his consent, the Company collects his location data, i.e. real-time information on the location of his device, either through the Application or through the Google Maps application. The user's location is determined based on the location of the wireless network or the Wi-Fi access points within the range of which he is located, as well as by use of the Global Positioning System (GPS);
- d) if the user provides the relevant consent, stored data and files, i.e. metadata, tags, and other data related to other files stored on the user's device, such as photos, video and audio files and information regarding his personal contacts and address book.

3. The purpose of processing of your personal data

The Company always processes your personal data for specific purposes, which are:

- To inform you regarding the nearest ElpeFuture charging point and provide you with relevant information.
- To give you instructions on how to reach that charging point by integrating a relevant service from an online digital map service with an integrated service providing real-time local traffic information through the Google Maps app.
- To give you with the option of creating an account, for easy and quick identification.

- To allow you to manage your cards.
- To give you access to your order history and allow you to monitor statistics based on your transactions.
- To help you calculate energy consumption and give you tips on economical driving.
- To improve the services it provides.
- To contact you, using any of your contact details, regarding the services offered.
- To promote the Company's products and to send information and advertising material, as well as offer vouchers.
- To create a user profile; provided you consent to such processing, the data you provide to the Company and the data resulting from the use of its services are taken into account, so that appropriate commercial communication messages can be sent to you according to your preferences and profile, and that Company services and products can be adapted to your individual needs.

4. Legal basis for processing your personal data

The Company legally processes your personal data and for each instance of processing there exists at least one of the following legal bases:

a) Processing is necessary for the performance of the Company's **contractual obligations**.

The Company may process data, provided that "processing is necessary for the performance of a contract to which the data subject is party". An example of personal data processing based on the legal basis of the contract is the processing of users' personal data required for the conclusion of the agreement for the use of the Application (e.g. name, surname, email, telephone number, password).

If you refuse to provide the Company with the data necessary for the conclusion and performance of the above agreement, such conclusion and performance shall not be possible.

b) The Company has your prior **consent** to process your data for one or more specific purposes. In this case, you are free to withdraw your consent at any time. Withdrawal of your consent shall not affect the legality of consent-based processing prior to such withdrawal.

Examples of processing based on your consent are the detection of your location so that you can be informed regarding the nearest ElpeFuture charging points, the accessing of your profile on social networking sites, and the sending of information to the user based on his profile.

c) Processing is necessary to serve the **Company's legitimate interests**, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data. Indicative examples of processing carried out by the Company for the pursuit of its legitimate interests are the following:

- The calculation of the size of the public and the standards of use, so that the services can be adapted to the individual interests of the users.
- The improvement of the services provided and provision of a better and more personalized user experience.
- The identification of users and speeding up of their searches.

5. Personal data retention period

The Company retains your personal data relating exclusively to your account for as long as it is active; as soon as you delete your account your data is deleted. In all other cases, the Company will retain your personal data in accordance with the applicable provisions of the law and only for as long as necessary in order to meet the above objectives or for the time required by law or to defend the Company any possible legal action brought against it.

6. Who has access to your personal data and to who is it transmitted?

The Company shall in no way share, exploit or in any way transmit your personal data to third parties other than those referred to in this Privacy Policy. Before any information is disclosed to a third party, the Company shall ensure that each recipient is bound by strict security standards and confidentiality.

In the context of the Company's activities and for the purposes mentioned in this Privacy Policy, only authorized employees of the Company have access to your personal data. In addition, the Company shall disclose the personal data of users in a form that allows personal identification in the following cases:

- *To companies of the HELPE Group*, when necessary for: the processing and storage of data, the provision of access to the Company's services, the provision of customer support, decision-making for the improvement of the Company's services, the development of content.
- To the Company associate providing the former with geolocation and navigation services through the Google Maps application. You can find out more about the Privacy Policy of this App at: <https://policies.google.com/privacy?hl=el>
- If the user gives his consent, the Company collects his *location data*, i.e. real-time information on the location of his device through the Google Maps application. The user's location is determined based on the location of the wireless network or the Wi-Fi access points within the range of which he is located.
- *To third party developers using the Application Programming Interface ("API")*, such as for example *Google Maps*. The use of third party applications developed using the API is subject to the terms of use and privacy policy of said third parties. When a user uses the

Application, certain third parties may use automatic data capture technologies to collect information regarding the user or his device. Third parties may use tracking technologies to collect information about the user each time he uses the Application's services. They may collect information relating to the user's personal data or they may collect information, including personal data, regarding the user's activities in the application. Third parties may use this information to provide interest-based (behavioral) advertising or other targeted content. The Company does not control these third-party monitoring technologies or the way in which they may be used.

- To the external associate of the Company that manages on behalf of the Company the central application for Management of the ElpeFuture Card and Payments, when the user uses that service.
- To other Service providers that the Company uses to provide marketing, advertising, communication, infrastructure and IT services, to personalize and optimize the services provided, to process transactions by credit card or other payment methods, to provide customer service, to analyze and improve data (including data on user interactions with Application functions), as well as to process and manage consumer surveys. In the framework of provision of such services, these Service Providers may have access to your personal data or other information. The Company does not authorize them to use or disclose your personal information beyond the extent required to provide their services.
- *In case of business transfer:* As part of the reorganization, restructuring, merger, sale or other transfer of assets, the Company shall transfer your information, including your personal data, if the recipient agrees to handle your personal data in a manner consistent with the Company's Privacy Policy.

As a rule, your personal data shall not be transmitted to countries outside the European Economic Area. However, if personal data is transmitted to countries outside the European Economic Area, the Company shall ensure the transfer of information in accordance with this Privacy Policy and the applicable data protection legislation.

7. Security

The Company takes appropriate security measures to ensure the best possible storage of all personal data and the avoidance of accidental loss, use or unauthorised access to personal data, and restricts access to personal data to persons who really need it to perform their duties.

Persons who process personal data on behalf of the Company act in accordance with the authorization granted to them by the Company and undertake a duty of confidentiality with respect to their actions. The Company has established procedures for dealing with any breaches of data security in order to be able to comply with its legal obligations in case of a breach of personal data.

8. Your rights

You have a number of rights regarding your personal data that are processed by the Company. In particular:

a) Rights of access, rectification and erasure

You have a right to request at any time to be informed about your personal data held by the Company and to request the modification, rectification, updating or erasure of this information. You may be asked for additional information in order for the Company to process your request, however, if you are given access to the information held about you, such access shall be granted free of charge, unless your request is manifestly unfounded or abusive. If you request further copies of this information from the Company, you may incur a reasonable administrative fee. If the Company has a legal right to reject your request, you shall be notified of the grounds for such rejection.

In some cases, especially as regards the data you enter in the Application, you are given the option to erase or modify your own data through the Application. Furthermore, as regards the erasure of your data, you have the right to erase some or all your data from the Application, either individually or via the full deletion of your account. Some of your data related to the provision of products and services by the Company (ElpeFuture Card) are retained in other Company systems, regardless of their erasure from the Application, as part of the provision of the product or service.

b) Right to object

This right allows you to object to the processing of your personal data, especially when the processing is conducted for the Company's legitimate interest. If the processing is carried out for the purpose of serving its legitimate interests, the Company shall comply with your objection and will terminate the specific processing, unless the Company may demonstrate compelling and legal grounds for the processing, which prevail over your interests, rights, and freedoms or such processing is done for the establishment, exercise or defense of the Company's legal claims. In case of objection to processing related to the granting of benefits to you by the Company and consequent termination of such processing, this may result in the Company's inability to provide such benefits in their entirety.

c) Right to restriction of processing:

In certain cases, you have the right to restrict or cease further processing of your personal data. In practice, this means that the Company may store your data, but will not be able to process it further, unless such processing is done with your consent or is necessary for the establishment, exercise or defence of the Company's legal claims, for the protection of the rights of a third party, or for reasons of public interest.

d) Right to data portability

You have the right to transfer your data to other controllers. For the implementation of the right to data portability, the Company will provide you with your data in a structured, commonly used and machine-readable format. In the alternative, data can be sent directly to your account. The right to portability applies to (i) data processed by the Company automatically (i.e. without human intervention), (ii) personal data provided by you, and (iii) personal data that the Company processes based on your consent or if processing is necessary for the performance of the agreement.

e) Automated individual decision-making, including profiling

You have the right to not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. The Company does not make automated individual decisions, but, with the consent of the user, creates the user's profile taking into account the data provided by the latter and the data resulting from the use of its services, in order to send appropriate commercial communication messages according to the user's preferences and profile, and adapts its services and products to the user's individual needs. Profiling for the above purpose does not produce legal effects concerning you or similarly significantly affecting you.

f) Right to lodge a complaint with the competent authority

You have the right to lodge a complaint with the competent supervisory authority, which in Greece is the Hellenic Data Protection Authority.

You may contact the Data Protection Agency as follows:

- **Postal address:** Data Protection Authority, Offices: 1-3 Kifisias Avenue, P.C. 115 23, Athens
- **Call Centre:** +30 210 6475600
- **Fax :** +30 210 6475628
- **Email:** complaints@dpa.gr
- **Submission in person:** At the Authority's offices, 1st floor, Protocol office, 09:00-13:00.

If you have any questions, feel free to contact us.

If you have any questions regarding this Notification, please contact us by calling +30 210 6302252, or by email at DPO@helpe.gr .