

Privacy policy

This privacy policy (this "*policy*") is provided by electriffy and all subsidiaries (referred to throughout this policy as "*electriffy*"). Electriffy is a controller for the purposes of the eu general data protection regulation (the "*eu data protection laws*"). This policy applies to individuals ("*you*" or "*your*") whose personal data we collect in relation to dealing with inquiries, maintaining your registration information, notifying you about changes to any of electriffy services, sending you marketing, providing customer support and managing the contents of this electriffy website (www.electriffy.com) (the "*website*") or recruiting new staff members.

How to contact us

If you would like to contact us in relation to this policy (e.g. Questions about how we process your personal data, request this policy in another format such as audio, large print, braille), please contact us at the details below:

Electriffy data protection office email – info@electriffy.com

1. Changes.

Electriffy may change this policy from time to time at electriffy's sole discretion. Accordingly, electriffy encourages you to review this policy periodically. Electriffy shall post an announcement on the website of any changes to this policy. The most current version of this policy shall be linked on the home page of the website.

This policy was last reviewed and updated effective 17 april 2023

2. Information collection, usage, and disclosure.

Electriffy collects and processes certain information that may personally identify you ("*personal data*").

2.1. Collection of personal data

Electriffy collects and processes the following personal data:

(a) **personal data you give electriffy.** This is information about you that you give electriffy by filling in forms on the website or by corresponding with electriffy by phone, e-mail, or otherwise. The information you give electriffy may include your name, address, e-mail address, user name and password, phone number, company name, job title/function, location, and details of any comments or feedback you provide to electriffy.

Electriffy processes personal data provided by individuals making job applications to electriffy. This includes name, phone number, email address, education, references, correspondence with you and interview notes during the application procedure, and other data in relation to your application.

Please note that when you submit a question via our email submission form or submit your resume for consideration for employment, this information is kept confidential and only disclosed to those who may be able to help answer your question or consider you for employment. We do not disclose your

personal data to other companies who intend to sell their products or services to you. For example, we will not sell your name or email address to a direct-marketing company.

(b) personal data electriffy collects about you.

Cookies

With regard to each of your visits to the website, electriffy may automatically collect the following information through the use of cookies (for more information about the cookies used on the website please refer to our cookie policy):

(i) technical information, including the internet protocol ("*ip*") address used to connect your computer or mobile device to the internet, mac addresses, traffic data, location data, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform and cookies

(ii) details of your visits to the website and your preferences and habits when using the website; electriffy will use this information to create a profile of you to enhance your customer experience with electriffy

(iii) information about your visit, including the full uniform resource locators ("*url*") clickstream to, though, and from the website (including date and time), your conduct via the website, and (where relevant) details of the fulfilment of any of your orders, and any other site activity, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call electriffy.

This website uses google analytics to track website activity and visitor behaviour. If you want to optout of being tracked by google analytics, you may use the <u>google analytics opt-out browser add-on</u>. Google analytics also collects data about visits to the website via the double-click cookie and floodlight tags. This information is being used to provide demographic and interest data about visitors to the website and to target online display advertisements on third-party websites. Using google's <u>ads</u> <u>settings</u>, visitors can opt-out of google analytics for display advertising and customize google display network ads.

While we track this information about the technology you are using, we do not identify who you are.

2.2. Usage of personal data

(a) personal data you give electriffy. Electriffy will use this information:

- To deal with your enquires and requests;
- To establish and maintain your registration information;
- To notify you about changes to any of electriffy's services;
- To provide you and/or your business with requested support; and
- To ensure that content from the website is presented most effectively for you and your computer.

(b) personal data electriffy collects about you. Electriffy will use this information:

- To administer the website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve the website to ensure that content is presented most effectively for you and your computer
- To allow you to participate in interactive features of the website when you choose to do so;

- To measure or understand the effectiveness of marketing to you and others, and to deliver relevant marketing communications about electriffy services and offerings to you where permitted; and/or
- To make suggestions and recommendations to you and other users of the website or electriffy's services about goods or services that may interest you or them.

2.3. Using your information in accordance with data protection laws.

Electriffy relies on the following lawful bases to process your personal data:

• Legitimate interests: electriffy is permitted to process your personal data if it is based on our "legitimate interests" i.e. Electriffy has good, sensible, practical reasons for processing your personal data which is in electriffy's interests. It is in electriffy's legitimate interests to process the personal data that you provide to electriffy as part of your registration and on contact/feedback forms and to process the personal data that electriffy collects from you when you use the website. It is in electriffy's legitimate interests as a business to process the above information to provide you with information and updates in relation to electriffy's services and ongoing projects, to administer the website, to ensure that content from the website is presented to you effectively and securely, to improve and optimize the website and to run promotional features. Furthermore, electriffy will need to process your personal data if electriffy has entered into a contract with the company that you work for.

Electriffy may also share personal data in connection with the (actual or potential) sale, purchase, merger, reorganization, liquidation, or dissolution of electriffy or part of electriffy.

Electriffy processes your personal data for recruitment purposes which are necessary to manage and grow our workforce.

We have considered the impact on your interests and rights and have placed appropriate safeguards to ensure that the intrusion on your privacy is reduced as much as possible.

You can object to the processing we carry out on the grounds of legitimate interests. Please refer to the section headed "your rights" to find out how.

- **Contract:** assuming that you are a sole trader, if you successfully register with electriffy as a trusted supplier or sub-contractor, electriffy may enter into a contract with you for the provision of goods and/or services. For electriffy to fulfill its obligations under such a contract, electriffy will need to collect and process your personal data.
- **Legal obligation:** electriffy is subject to legal obligations to process your personal data to ensure electriffy is complying with applicable regulatory rules and to make mandatory disclosures to government bodies and law enforcement agencies.
- **Consent:** at times electriffy relies on consent to send marketing. More information about electriffy's marketing is provided in the section headed "marketing". Please note that you can opt-out at any time by following the instructions in the marketing communication (e.g. Clicking "unsubscribe" in the marketing email) or contacting electriffy by using the information in the "how to contact us" section.

2.4. Retention of your information.

Electriffy will retain your personal data for the period necessary to fulfill the purposes for which the information was collected. After that, electriffy will delete it.

The retention period may vary depending on the purposes for which the information was collected. Where a specific legal or regulatory requirement applies to your personal data, electriffy will retain it for the period of time specified in such legal or regulatory requirement. In the absence of a specific legal or regulatory requirement, electriffy will retain your information for 10 years following the event to which it relates (e.g. The specific project, inquiry, etc). Electriffy may be required to extend the retention period if the information is required due to a complaint or because it is required for litigation. Please also note that electriffy is sometimes legally obliged to retain the information, for example, for tax and accounting purposes.

If you would like more information on the retention period of your personal data please contact us using the information in the section headed "how to contact us".

2.5. **Disclosure of your information**. Electriffy will not share your personal data with third parties, save as follows:

- With electriffy's business partners, product and services suppliers, and sub-contractors for the performance of any contract we enter into with them or you or the company you work for;
- With electriffy's parent, subsidiary, and sister companies for the purposes of marketing and only where you have provided your consent, as described below; and
- With analytics and search engine providers that assist electriffy in the improvement and optimization of the website and other selected third parties.

For more information about who we share your personal data, please contact us using the details in the section "how to contact us".

Electriffy may also share personal data with law enforcement / regulatory authorities, other government officials, and/or electriffy's legal and professional advisors to (1) protect or defend the legal rights, property, safety, or security of electriffy or anyone else, (2) protect against fraud or for risk management purposes, (3) comply with a legal process, legal requirement, a judicial proceeding, or court order, (4) investigate a possible crime, such as fraud or identity theft, or (5) as required by law.

Electriffy may also share personal data in connection with the (actual or potential) sale, purchase, merger, reorganization, liquidation, or dissolution of electriffy.

Electriffy does not sell any customer or prospect data but may use such data for measurement or enhancement of customer experience in marketing or sales endeavors. Electriffy does utilize partners in the analysis of web traffic and social media data, but those partners are held to the same standards as electriffy.

2.6. **Security.** Electriffy takes reasonable precautions to protect personal data and has put in place certain processes and procedures to prevent unauthorized access to personal data. Unfortunately, there is always a potential risk in sending information through any channels, and electriffy cannot guarantee that communications between you and electriffy, including personal data, shall be free from unauthorized access by third parties. Electriffy shall not be held responsible (i) for any unauthorized access or illegal or unauthorized use of information, including personal data, or (ii) if your information, including personal data, is accessed through unauthorized or improper use of your account or login information or due to your failure to secure your username, password, or customer id.

2.7. **Storage of your information.** The data that electriffy collects from you I and will be stored in the EU.

2.8. Marketing

Electriffy may use personal data (including your email addresses, phone numbers, and unique device numbers) to send you promotional materials relating to electriffy's services that are similar to those that you have already purchased or enquired about. If you have not previously purchased or enquired about such services, electriffy will not send you promotional materials without first obtaining your consent to do so.

If you want to stop receiving such promotional materials from electriffy, then you should follow the applicable unsubscribe or opt-out instructions.

Electriffy's affiliates or business partners may also use your personal information to contact you about other goods and services, provided that you have given your consent (if this is required).

You may withdraw your consent or, where your consent was not required, opt-out to the use of any of your personal information for marketing purposes, at any time by contacting electriffy at <u>info@electriffy.com</u> You will also be given the opportunity in each marketing communication to opt-out of future marketing communications.

3. Links to other sites

The website may contain links to other websites. Those other websites may not have the same privacy policy as electriffy, and electriffy is not responsible for the privacy practices of those other websites. When you visit those other websites, you should read their privacy policies. This policy applies solely to the processing activities of electriffy.

4. Your rights

You have certain rights in relation to your personal data that is processed by electriffy under uk/eu data protection laws. These rights are listed below. These rights are not absolute and apply subject to certain conditions, as set out in uk/eu data protection laws. Your rights may include: • the right to access personal data held by electriffy about you;

- The right to require electriffy to rectify any inaccurate personal data held by electriffy about you;
- In certain circumstances, the right to require electriffy to erase personal data held by electriffy about you;
- In certain circumstances, the right to restrict electriffy's processing of personal data held by electriffy about you;
- In certain circumstances, a right to receive personal data which you have provided to electriffy in a structured, commonly used, and machine-readable format. You may also have the right to require electriffy to transfer this personal data to another organization, at your request;
- The right to object to electriffy's processing of personal data held by electriffy about you (including to send marketing materials to you); and
- The right to withdraw your consent, where electriffy is relying on your consent to use your personal data (for example, to provide you with marketing information about electriffy's services and products).

If you have any concerns regarding our processing of your personal data or are not satisfied with our handling of any request made by you in relation to your rights, please do contact us in the first instance at info@electriffy.com. You also have the right to make a complaint to the information commissioner's office.