

## PRIVACY POLICY OF WALLBOX

### **1. General information**

- 1.1.** WALLBOX is the data controller of the personal information you provide as a data subject. This Privacy Policy is applicable to the Service and to any data subjects who access and use it (Users, Clients and Charging Users). With your freely given, specific, informed and unambiguous consent of the relevant data subject, WALLBOX will process data on a lawful, loyal and transparent ground, and it commits to comply with the legal obligations imposed by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the "GDPR"), the Spanish Organic Law 3/2018, of 5 December 2018, for the Protection of Personal Data and the Guaranteeing of Digital Rights (LOPD-GDD) and the European and Spanish developing regulation in force (hereinafter the "**Data Protection Regulation**").
- 1.2.** WALLBOX shall be the data controller of the personal information provided by data subjects, in particular Users, Clients and Charging Users. In the cases that Charging Users carry out charging on Devices made available by Clients through public charging networks, such Clients will also be data controllers for the processing of personal information of Charging Users. In this latter case, WALLBOX states that such data are processed for the respective provision of the Service by such Clients to Charging Users, and WALLBOX does not transfer the data provided by such Charging Users to Clients.
- 1.3.** Prior to accessing certain information and content of our Service, you must previously register as a Client and register a "myWallbox" account through the corresponding forms on the Website, the Portal or the Application, and you must accept, in accordance with the Data Protection Regulation, the processing of your personal data. In any case, as long as the provision of the Service requires your registration and the provision of certain personal data, the request for cancellation of such data will entail the corresponding cancellation of registration and deletion of your "myWallbox" account, and therefore, the Client may not use those features that require a prior registration. However, you may keep your "myWallbox" account active and object the processing of your personal data to receive commercial, promotional and/or advertising communications.

### **2. Which data does WALLBOX process?**

- 2.1.** All your personal information we request for registering or contacting us via the Website, the Portal or the Application is mandatory. If you do provide us with this information, WALLBOX may not offer you the register and/or the use of the Service. Likewise, if you register successfully as a Client, WALLBOX will also collect certain necessary information regarding your use of the Service
- 2.2.** In particular, WALLBOX will process the following categories of data:
  - Your identification data (e.g. your name and surname, your user name and password);
  - Your contact information (e.g. your email address, your telephone number);
  - The identification data of your device (specifically, the push token of your mobile phone);
  - Your biometric data (i.e. your face image in order to use the facial recognition functionalities provided by WALLBOX). By transferring your personal image, you authorize us to use it only for this purpose, and you assign all the necessary rights on it. Furthermore, you guarantee us that the image provided for your identification does not infringe any third party rights. In any event, you shall hold WALLBOX harmless of any claim of third parties arising out of its use;

- Information of your activity and your use of the Charging Service, including charging preferences, settings, charging amount, etc.;
- Professional data (e.g. information on education and professional experience that you may publish on your résumé, only in the event you sent it us in order to apply to our job offers).

### **3. For what purposes do we process your data?**

WALLBOX collects and processes manually and/or automatically all the data you provide solely for the purposes consented in each case. We can dispose and process your data in order to:

- Manage your “myWallbox” account so that you can use our Charging Service and access to the Devices;
- Receive customised notifications based on your use of the Application and the Portal;
- Only if you have authorised us to do so, we will process your data in an automated way to create user profiles, made from the data you provide us from your registration as a Client and from the data on the use of the Charging Service. These profiles will be used by WALLBOX, and may be transferred to third companies with which we collaborate, to send you commercial communications about our own products and services and those from such third companies, all in a personalized way to your consumption and commercial preferences;
- Solve all your informative enquiries and answer the requests that you make us via our remote assistance services, our Website, our Portal or our profile pages on online social media or social networking platforms;
- Send you information, as well as commercial, promotional and/or advertising communications, including newsletters and promotional and advertising messages about the products and services of WALLBOX.
- Manage your education and professional information for purposes of recruitment and selection of candidates and employees; in the case you file your résumés or your application to work with us.

### **4. For how long do we keep your information?**

- 4.1.** We keep your information only for as long as is necessary for the purpose for which it was collected, or during the time you maintain your User Account, or during the necessary time to comply with your request, until you unsubscribe or request not to receive our informative and commercial communications about our services.
- 4.2.** We can keep your personal data longer, even after you stop using our service, and only when required to do so by law, under a Court order or in response to lawful demands of public administrations and officials, in which case your personal data will be duly kept, and protected of all WALLBOX systems, to prevent their access and processing. Once the possible actions prescribe, we will proceed to the removal of your personal data.

### **5. What does legitimate us to process your data?**

WALLBOX’s legitimate interests for the processing of the personal data we collect through the forms of the Website, the Portal, the Application, and the Devices through their use is based on the freely given, specific, informed and unambiguous consent you give us for the processing of your data with the following purposes:

- The data processing to manage your "myWallbox" Account, including your face image, is necessary to us to enable your login and use of the Website, the Portal, the Charging Service, the Application and the Devices. Our lawful ground for processing this data is your consent and that our processing is necessary to provide our service.
- The processing of your identification and contact information is necessary so that we can manage efficiently and response to your request for information through the Website or the Portal, regarding our services, as well as to provide you our remote technical assistance services. Our lawful ground for processing this data is your consent and that our processing is necessary to provide our service.
- The processing of your data to enable us to send you notifications is necessary so that you are properly informed about how to optimize the use of our Application and our Portal. Our lawful ground for processing this data is your consent and that it is in our legitimate business interest to do so.
- The processing of the activity data during your use of the Charging Service so as to we may create user profiles, in the case you have authorized to do so, is necessary to provide you with a personalized experience of your use of our Application and our Portal adapted to your needs, to improve the efficiency and quality in the provision of charging, to analyse and/or predict your habits and preferences of consumption and mobility, as well as to offer you any kind of products and/or services, either directly by us or by third companies to whom we transfer such profiles, personalized to your commercial and consumption preferences. Our lawful ground for processing this data is your consent and that it is in our legitimate business interest to do so.

In any case, you have the right to revoke your consent for this purpose at any time, by following our instructions indicated in section 8 of this Privacy Policy, *"What are your rights when you provide us with your data"*. In the event that you do not give your consent for our processing of data derived from your use of the Service for the above purpose, WALLBOX may also collect such data using the Service applying anonymization techniques, so that your use of the Service does not involve processing of personal data.

- The processing of your identification and contact details so as to send you informative and commercial communications is necessary in order to keep you updated about our services. Our lawful ground for processing this data is your consent and that it is in our legitimate business interest to do so.
- The processing of your education and professional information is necessary to us to manage your recruitment and, if so, your employment, in the event that you send us your résumé or WALLBOX posts a job or a collaboration offer. Our lawful ground for processing this data is your consent and, if applicable, your agreement entered into with us.

## **6. To whom can we communicate your data?**

- 6.1.** We may need to share your personal data with third parties, only if such transfers are necessary to provide you with our services. When we do so, such data may only be accessed by WALLBOX personnel and by those third parties whose services we hire.
- 6.2.** In particular, your personal data may be provided to IT suppliers, who provide us with data management and hosting services, which are necessary for the provision of our service, as well as to external private administrative agencies, in order to them being able to provide us with the administrative services we have purchased with them. Furthermore, we may share your data in order to duly comply with our legal obligations, or for the purposes of communication to credit and asset solvency information files, in case of non-payment of our services, prior unsatisfactory payment request.

**6.3.** In particular, we may share your data with the following third parties:

- Public Administrations and Officers, and Courts when required by tax, labour or any other applicable law;
- Suppliers of systems for the recognition and identification of users by face, fingerprint or voice, for those devices we commercialise that may incorporate such functions;
- Service providers of data hosting and management systems;
- Service providers of distribution, installation and maintenance of devices in order to offer our preventive management services.

**6.4.** Likewise, and only in the case you have authorized to do so, your personal data and your profile as a Client will be transferred to third parties with whom we collaborate, with the purpose of sending communications and offer adapted to your commercial and consumption preferences.

## **7. How do we protect your data?**

**7.1.** We are committed with the security of your personal information. We guarantee you that we have implemented organisational and technical security measures required by law that are adequate to the processing of your personal data, by installing and/or adopting all the technical, personal and organisational measures so as to guarantee the confidentiality, integrity and quality of the information, as well as to avoid the loss, misuse, alteration, unauthorised access and theft of the personal data provided.

**7.2.** WALLBOX implements security measures such as encryption and access control procedures in order to prevent unauthorized access to data and guarantee its confidentiality. We also ensure that our employees, collaborators and managers are suitably qualified and trained to protect your personal information and ensure its confidentiality.

**7.3.** Any kind of security breach in your personal data that constitutes a risk to your rights will be immediately notified by WALLBOX to the Spanish supervisory authority (“Agencia Española de Protección de Datos”).

## **8. What are your rights when you provide us with your data?**

**8.1.** WALLBOX is committed to protect your privacy and the confidentiality of your personal information. For such reason we will give you an adequate response when you request the exercise your rights. You may exercise your rights by sending an email to our address [dpo@wallbox.com](mailto:dpo@wallbox.com), duly identifying yourself and clearly indicating the purpose of your request.

**8.2.** Specifically, you have the following rights in relation to the personal data we hold about you:

- Right of access: you have the right to request access to the personal data we are processing and to obtain information about the processing we are doing;
- Right to rectification: if the personal information we hold about you is inaccurate, incomplete or obsolete, you are entitled to request its rectification.
- Right to erasure: you can ask us to delete or remove your personal data in some circumstances, such as when you consider that its processing is unnecessary or illegitimate;
- Right to restrict processing: you can ask us to limit the processing of your personal data in certain circumstances such as where you contest the accuracy of that personal information or object to us processing it.

- Right to data portability: you have the right, in certain circumstances, to obtain personal information you have provided us with, in a structured format, commonly used and machine readable format, and to ask us to transfer this to another third party of your choice.
- Right to object: you can ask us to stop processing your personal information, on a legal basis, in relation to you or if it significantly affects you, unless the processing is necessary for reasons of public interest;
- Rights in relation to automated decision-making and profiling: you have the right to object to the automated processing of your data, including its processing for profiling purposes in the case you have previously authorized us to do so, when it produces a legal effect or significantly affects you;
- In the event that WALLBOX does not answer a query regarding your exercise of your rights, you have the right to file a complaint to the Spanish supervisory authority (“Agencia Española de Protección de Datos”) via the link <http://agpd.es>, by phone 901 100 099 or by post at the address Agencia Española de Protección de Datos, C/Jorge Juan nº 6, 28001, Madrid, Spain.

## **9. Privacy Policy Modifications**

- 9.1.** WALLBOX reserves the right to modify this Privacy Policy complying with the rules in force at any time. Thus, we may inform such modifications to you when they are made, which are going to be binding once published. We encourage you to periodically visit this Privacy Policy so as to acknowledge about how we process and protect the personal data you provide us.
- 9.2.** Any questions or queries regarding this Privacy Policy must be addressed to the following address: Wall Box Chargers, S.L. C/ Foc nº 68, 08038, Barcelona, Spain, or via email to: [dpo@wallbox.com](mailto:dpo@wallbox.com).

## **10. Data Protection Officer**

WALLBOX has appointed a Data Protection Officer, who will hold responsibility for the supervision and the ensuring of the compliance with this Privacy Policy, in relation to any processing of personal data of our data subjects.