



VARTA Storage GmbH – Privacy Policy VARTA Storage Portal, VARTA Storage Warranty for Residential Energy Storage System und Online Service Agreement for End Customers

Controller (Art. 13 GDPR) for the processing of your personal data is VARTA Storage GmbH, Nürnberger Straße 65, 86720 Nördlingen.

This privacy policy describes the processing of your personal data in the context of the registration and use of the VARTA Storage Portal, the VARTA Storage Warranty for Residential Energy Storage Systems and the Online Services contract.

In addition, the general data protection declaration of VARTA AG Group applies, which contains information on, among other things, data security, your rights under the GDPR and the contact details of the responsible persons and the data protection officer. These can be viewed here: <https://www.varta-ag.com/en/privacy-policy>

Processed Personal Data

The following data is compulsorily collected during the portal registration, which is also the basis for the use of the portal, the guarantee as well as the online service contract:

- First and last name
- E-mail address
- Password
- Serial number of the VARTA Energy Storage System
- Activation Code (one time)
- Technical Data, as further detailed below

The following data is also processed if communicated by the user:

- Title
- Address(es)
- Phone Number(s)
- Contact form information, for example further contact details or additional instructions to us

The *Technical Data* which are used in this context are the following:

- Data related to the VARTA System:
time of the notification; quantity of battery modules; mains voltage on the VARTA System; current and energy flows in and from the VARTA System; current and energy flows at the house connection point; mains frequency; system parameters for inspection purposes and to determine the condition in the VARTA System; temperature of components and environment; error messages;
- Data related to the battery modules:
voltage; current; charge status; temperature; energy flow; charge cycles; temperature of the power electronics; error code.



Purposes, legal basis and retention period

The aforementioned data will be processed for the following purposes, based on the following legal basis and stored for the duration outlined below, unless longer retention periods are required by law:

Portal

For the initial registration to the portal, first and last name, e-mail address, password, serial number and activation code are collected and processed. This serves to set up the portal access and assignability of the VARTA Energy Storage System to the individual user. The legal basis is the processing for the preparation and execution of a contract (Art. 6 para. 1 lit. b) GDPR). The data is stored for the duration of the contract.

Then the login data (email and password) is used for the subsequent logins of the user. The legal basis is again the processing for the execution of the contract (Art. 6 para. 1 lit. b) GDPR). The data is stored for the duration of the contract.

Within the portal, the master data of the battery system is displayed and, if the battery system is online, the above-mentioned technical data is processed to visualize the use and status of the battery system in the user's household. This serves the provision of the services offered by the portal and thus the fulfillment of the usage contract for the portal (Art. 6 para. 1 lit. b) GDPR). Storage of the current technical data is not necessary for this purpose, but takes place for other reasons, which will be mentioned below.

Note: For users with an offline warranty, use of the portal functions is voluntary; the user can interrupt data transmission at any time by disconnecting the battery system's internet connection. However, users with an online warranty jeopardize their claims under the online warranty by disconnecting the Internet connection. Further notes can be found in the respective warranty declaration.

Warranty

Within the scope of the warranty, first and last name, e-mail address and serial numbers are processed for the identification of the contractual partner. This serves the performance of the contract (Art. 6 para. 1 lit. b) GDPR). The data is stored for the duration of the warranty.

In the context of processing warranty claims, first and last name, e-mail address and technical data are used. This serves the examination and fulfillment of warranty claims and the contacting of the user, thus for the fulfillment of the contract (Art. 6 para. 1 lit. b) GDPR). If the user has provided further voluntary information, this will also be used to contact him. This includes title, address, phone number or information in the contact form of the portal registration, e.g. further contact options.

In individual cases, VARTA Storage may also use the communicated contact data as well as the technical data for the defense or enforcement of legal claims against the user or third parties, such as suppliers of VARTA Storage. The legal basis for this is the overriding interests of VARTA Storage in an effective legal defense and enforcement, compared to which the interests of the user are subordinated (Art. 6 para. 1 lit. f) GDPR). VARTA Storage will keep the personal data of the user anonymous as far as possible when enforcing claims against third parties. For reasons of legal defense and enforcement, it is necessary to store the technical data for the duration of the guarantee, and beyond that only as long as the legal defense or enforcement is still ongoing.



Online Services Agreement

In order to provide the services under the Online Services Agreement, VARTA Storage processes the technical data and the serial number as well as, if cooperative actions of the user are necessary for this purpose, the user's e-mail and first and last name. The purpose and legal basis is the processing for the performance of the contract (Art. 6 para. 1 lit. b) GDPR). If the user has provided telephone number, address or other contact options via the contact form, this data will also be used to contact the user if VARTA Storage deems this helpful. The data will be stored for the duration of the contract.

Other purposes, including advertising, safety instructions, service requests, technical progress

If consent is given (Art. 6 para. 1 lit. a) GDPR), VARTA Storage uses first and last name, e-mail address and / or telephone number, if necessary in comparison with the technical data, for targeted advertising for products of VARTA Storage. The consent can be revoked at any time for the future. VARTA Storage can then no longer send promotional offers.

VARTA Storage reserves the right to use the first name and surname as well as the communicated address for mail advertising about products of VARTA Storage to the user. The legal basis is the overriding interest of VARTA Storage in an advertising opportunity for its products, compared to which the interests of the user are subordinated (Art. 6 para. 1 lit. f) GDPR). The data will be stored for this purpose until any objection by the user or until the point in time at which the aforementioned interest of VARTA Storage ceases to apply.

It can never be ruled out that safety risks may arise from the actual use of the energy storage systems. For minor indications that are solely related to the performance of energy storage systems, VARTA Storage uses the contact data provided by the user such as title, first and last name, e-mail address, address, telephone number or information in the contact form of the portal registration to contact the user on the basis of a secondary obligation from the existing contracts with the user, in particular the concluded warranty (Art. 6 para. 1 lit. b) GDPR). If, in the unlikely event, risks to the life or health of the user or third parties arise, we use all available data to warn of such risks and to remedy the risks (Art. 6 para. 1 lit. d) GDPR).

VARTA Storage answers general service requests using first and last names and e-mail address, as well as telephone number, address or other ways of communication, if applicable, insofar as these have been communicated by the user in this context or have been released or are necessary for communication. The legal basis in this case is the processing of the request (Art. 6 para. 1 lit. b) GDPR) or, in individual cases, the overriding interest of VARTA Storage in the most effective processing of the request (Art. 6 para. 1 lit. f) GDPR). The data stored separately for this purpose will be stored for the duration of the request and then deleted within 3 months.

VARTA Storage will use the technical data and serial number, and if necessary in individual cases the first name and surname as well as the e-mail address, for the support of technical progress at VARTA Storage or companies associated with VARTA Storage, provided that the relevant consent has been given (Art. 6 Para. 1 lit. a) GDPR). Consent may be revoked at any time for the future. V Storage can then no longer use the data.

For all communication with the User, VARTA Storage uses the voluntarily provided title, based on the consent of the User (Art. 6 para. 1 lit. a) GDPR), in order to be able to address the user in the most proper manner. VARTA Storage stores the title of the user until the revocation of the consent, which can



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be revoked at any time for the future, and also deletes this information without revocation at the latest when deleting the remaining data records for the user. A revocation has no influence on the fulfillment of the contract or other services of VARTA Storage.