



VARTA Storage GmbH – Privacy Policy VARTA Energy Portal

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

This Privacy Policy describes the processing of your personal data in the context of the registration and use of the VARTA Account Service, VARTA Energy Portal Terms of Use, the VARTA Storage Warranty for VARTA Systems and the VARTA Energy Storage Terms of Service.

VARTA Systems are understood to be products of VARTA Storage GmbH, such as energy storage systems, VARTA Link and future products.

In addition, the VARTA AG Group's general privacy policy applies, which includes information on data security, your rights under the GDPR and the contact details of the controllers and the data protection officer. It can be viewed here: <https://www.varta-ag.com/en/privacy-policy>

Processed personal data

The following personal data is collected when creating a VARTA account:

- First and last name
- Email address

The following personal data is collected during the portal registration process:

- First and last name
- Email address
- Serial number of the VARTA System
- Activation code (one time)

The following personal data is also collected if it has been provided by the data subject (the user):

- Title
- Address(es)
- Phone number(s)
- Contact form information, such as further contact details or instructions
- Location of the VARTA System

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:



VARTA Account Service

For the initial registration and login to the VARTA Account Service, first and last name, email address, consent to the Terms of Use, consent to the Terms of Service and the Privacy Policy are collected and processed. This serves to set up a VARTA account, which is a prerequisite for using other VARTA online services such as the VARTA Energy Portal. The legal basis is the processing for the preparation and performance of a contract (Art. 6 para. 1 lit. b) GDPR). The data is stored for the duration of the contract.

The login data is then used for subsequent logins by the user. The legal basis is again the processing for the performance of the contract (Art. 6 para. 1 lit. b) GDPR). The data is stored for the duration of the contract.

Keycloak

We use the SingleSignOn application 'Keycloak' for user login. It is used to manage access rights for applications and user identification and login for these applications. The following data categories are processed for this purpose, depending on the occasion: Password, e-mail address, first name, surname, consent to terms of use account service, consent to privacy policy, consent to terms of service, address(es), telephone number(s), information from free field details, location of the VARTA system. The legal basis is the processing of data for the fulfilment of the contract (Art. 6 para. 1 lit. b) GDPR).

VARTA Energy Portal

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

The login data is then used for subsequent logins by the user. The legal basis is again the processing for the performance of the contract (Art. 6 para. 1 lit. b) GDPR). The data is stored for the duration of the contract.

Within the VARTA Energy Portal, the serial number of the VARTA System is displayed. This serves to provide the VARTA Online Services offered by the VARTA Energy Portal and thus the fulfilment of the VARTA Energy Portal Terms of Use (Art. 6 para. 1 lit. b) GDPR).

VARTA.energy has an installer area and an end customer area, which provide the corresponding functions for each role.

Warranty

Within the scope of the warranty, first and last name, email 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 and email address are collected and processed. This serves the verification and fulfilment of warranty claims and the contacting of the user for the purpose of performing 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/her. This includes title, address(es), phone number(s) or information in the contact form of the portal registration, such as further contact options.

In individual cases, VARTA Storage may also use the communicated contact data for the defence 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 effective legal defence 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.

Terms of Service for VARTA products

In order to provide the VARTA Online Services under the VARTA Energy Storage Terms of Service, VARTA Storage processes the serial number and, if cooperative actions of the user are necessary for this purpose, the user's email address and first and last name. The purpose and legal basis are the processing for the performance of the contract (Art. 6 para. 1 lit. b) GDPR). If the user has provided telephone number(s), address(es) 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 is stored for the duration of the contract.

Other processing, 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, email address and/or telephone number, if necessary, in comparison with the technical data, for targeted advertising of VARTA Storage products. 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 last name as well as the communicated address for postal advertising of VARTA Storage products 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 generally subordinated (Art. 6 para. 1 lit. f) GDPR). The data will be stored for this purpose until the user objects or until the point in time when the aforementioned interest of VARTA Storage no longer applies.

It can never be ruled out that safety risks may arise from the actual use of the VARTA Systems. For minor indications that are solely related to the performance of the VARTA Systems, VARTA Storage uses the contact data provided by the user, such as title, first and last name, email 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). In the unlikely event of risks to the life or health of the user or third parties, we use all available data to warn of such risks and to eliminate the risks (Art. 6 para. 1 lit. d) GDPR).

VARTA Storage answers general service enquiries using first and last name and email address, as well as telephone number, address or other communication channels, if these have been provided by the user in this context or have been authorised or are necessary for communication. The legal basis in this case is the processing of the enquiry (Art. 6 para. 1 lit. b) GDPR) or, in individual cases, the overriding interest of VARTA Storage in processing the enquiry as effectively as possible (Art. 6 para. 1 lit. f) GDPR). The data stored separately for this purpose is stored for the duration of the enquiry and then deleted within 3 months.

VARTA Storage uses the serial number and, if necessary in individual cases, the first and last name and email address to support technical progress at VARTA Storage or companies affiliated with VARTA Storage if the relevant consent has been given (Art. 6 para. 1 lit. a) GDPR). Consent can be revoked at any time for the future. VARTA Storage can then no longer use the data.

For all communications with the user, VARTA Storage uses the title voluntarily provided on the basis of the user's consent (Art. 6 para. 1 lit. a) GDPR) in order to be able to address the user in the most appropriate manner. VARTA Storage stores the user's title until the revocation of the consent, which can 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 performance of the contract or other services of VARTA Storage.