

Privacy Notice for the Smoov app

Introduction

If you drive an EV, Smoov is your companion. Smoov makes your life easier, because you will always be able to find an available charging station in your area, quickly and easily. You can see how much you are charging at any given time. Smoov sends you notifications you when your favorite charging station becomes available, or when it is occupied. Soon, you will even be able to reserve a charging station with Smoov, and it will be possible to make use of special promotions or deals for your favorite charging stations.

In order to use our Smoov services we have to process personal information. We take our responsibilities towards processing personal information very seriously. This Privacy Notice describes Allego's practices regarding the collection and use of your personal data. It also sets forth your privacy rights. Information privacy is an ongoing responsibility, and so we will from time to time update this Privacy Notice as we undertake new practices with regard to processing personal data or adopt new privacy policies.

Data Protection Officer

Allego is headquartered in Arnhem, the Netherlands. Allego has appointed a data protection officer for you to contact if you have any questions or concerns about Allego's personal data policies or practices. Allego's data protection officer's contact information is as follows:

Allego B.V.
Attn: Data Protection Officer
Industriepark Kleefse Waard
Westervoortsedijk 73
6827 AV Arnhem
The Netherlands
dpo@allego.eu
+31 (0)88-7500300

1. How we collect and use (process) your personal information

Allego and its contracted third parties collect personal information from Smoov users. This information is limited to the kinds of information that must be used to use the services that Smoov offers. This information can include, initials, last name, email address, telephone number, Facebook account name, Google+ account name, charge token (i.e. card, key tag), bank account number and credit card number. We use this information to provide you with our Smoov services, including remembering your preferred settings, payment for charging sessions, finding a charging station and (in the near future) reserving charging stations. We do not share or sell personal information to anyone and only share it with third parties who are facilitating the delivery of Smoov services.

1.1 When logging into the Smoov app

There are three ways in which you can use the Smoov app and we collect and process your personal data for payment services. You decide which method you use.

- You can use Smoov as a guest. If you use the Smoov app as a guest, you need not register and provide your name or email address. When you use Smoov as a guest, you can use the app to search for charging stations and pay for charge sessions through direct payment (i.e. through your bank or credit card provider).

- You create an account in Smoov through your personal social media account (Facebook or Google+). To do so, you will need to login via one of these accounts and allow Smoov to access the general account information. This permission can always be revoked through the Facebook and Google+ app. When you log into Smoov with your social account, you can use the direct payment method, pay with a credit card, or use your Mobility Service Provider (MSP) card. And services like favorizing and monitoring of chargers will become available. Personal preferences and charging session history can also be looked up.
- You create an account by using your email account. To do so, you must use your email address. When you log into Smoov with your email address, you can use the direct payment method, credit card, or use your MSP card. As with a social media account, services like favorizing and monitoring of chargers will become available. Personal preferences and charging session history can also be looked up.

1.2 When using your location data

You can use Smoov to locate, check availability, and (in the near future) reserve Allego charging stations. The default setting in Smoov is set to not track your location. If you want to use our service to look up, check availability, and (in the near future) reserve charging stations you must give explicit permission through the Smoov app on your phone to use your location to locate charge station. Allego does not store, nor track your location through this functionality.

1.3 When adding your Mobility Service Provider (MSP) card to the data base

To be able to use your MSPs charge token (i.e. card, key tag), you must enter your charge card number issued by your MSP. When you choose to add your charge token, which was issued by your MSP, to the Smoov app, the card number on your charge card must be used. This is personal identifiable information. This processing of this information is necessary for Allego and your MSP to enable you to charge your vehicle. Your charge card details are directly sent through a secured connection to the relevant roaming provider, enabling the charging sessions invoiced to your MSP.

1.4 When paying for a charging session through the direct debit method

In order to use the direct debit payment method, you must carry out a SEPA registration through the Smoov app with the electricity provider of the Allego charging station. In order to do so you must fill in: your initials, your last name, your IBAN (bank account number) and your email address. The processing of this information is necessary if you want to use this payment method. When you choose to charge your vehicle through a direct payment, your bank account details are directly sent through a secure connection to the electricity supplier of the Allego charging station. Allego does not itself process or store the bank account information. This feature is not available in all countries yet.

1.5 When paying for a charging session with a credit card

In order to use the credit card payment method, you must register your credit card with the payment (service) provider through the Smoov app. The processing of this information is necessary if you want to use this payment method. Your credit card information is provided directly by you, triggered by the Smoov app, into the PCI/DSS-compliant payment processing service to which Allego subscribes. Allego does not, itself, process or store the credit card information. This feature is not available in all countries yet.

1.6 Contacting the Allego service desk

You can correspond with us by email, telephone, or the postal service. We may retain such correspondence and the information contained in it and use it to respond to your inquiry; to notify you on other services; or to keep a record of your complaint, request, and the like. If you wish to

have Allego “erase” your personal information or otherwise refrain from communicating with you, please contact us at dpo@allego.eu.

1.8 Improving our services

We use data about charging sessions (for example: time, duration, location of the charging session) to further improve our services.

2. When and how we share information with others

Information about your charging sessions and location data are maintained in association with your account. The personal information Allego processes from you is stored in one or more databases hosted by third parties Allego has contracted and are located in the European Union. These third parties do not use or have access to your personal information for any purpose other than cloud storage and retrieval related to the services of the Smoov app.

We do not otherwise reveal your personal data to third parties for their independent use unless: (1) you request or authorize it; (2) the information is provided to comply with the law (for example a court order), enforce an agreement we have with you, or to protect our rights; or (3) the information is provided to our agents or service providers who perform functions on our behalf. We also gather aggregated (but not personally identifiable) information about charging sessions from Smoov app users and use such aggregated information to our partners, service providers, and/or other third parties for improving the Smoov app (related) services.

3. Transferring Personal Data within the European Union

Allego has its headquarters in the Netherlands and is subject to the General Data Protection Regulation. Information we collect from you will be processed solely by Allego and our contracted third parties in the European Union.

4. Data subject rights

The European Union’s General Data Protection Regulation and other countries’ privacy laws provide certain rights for data subjects. A good explanation of them can be found on the websites of various Supervisory Authorities in the countries in which Allego operates:

Click [here](#) for the website of the Commissie voor de bescherming van de persoonlijke levenssfeer / Commission de la protection de la vie privée of Belgium.

Click [here](#) for the website of the Bundesdatenschutzbeauftragte of Germany.

Click [here](#) for the website of the Autoriteit Persoonsgegevens the Netherlands.

Click [here](#) for the website of the Information Commissioner’s Office of the United Kingdom.

This Privacy Notice is intended to provide you with information about what personal data Allego collects about you and how it is used. If you have any questions, please contact us at dpo@allego.eu.

If you wish to confirm that Allego is processing your personal data, or to have access to the personal data Allego may have about you, please contact us at dpo@allego.eu.

You may also request information about: the purpose of the processing; the categories of personal data concerned; who else outside Allego might have received the data from (or through) Allego; and how long it will be stored. Details pertaining to charging sessions are securely stored for the

statutory minimum amount of time. All other data is stored as long as you have an account with Smoov.

You have a right to correct (rectify) the record of your personal data maintained by Allego if it is inaccurate. You may request that Allego erase that data or cease processing it (in the case that you have given explicit permission to process data), subject to certain exceptions. You have a right to lodge a complaint with Dutch data protection authority (regardless of the country in which you make use of Smoov services) if you have concerns about how Allego processes your personal data. You must direct your complaints towards the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) in the Netherlands. Click [here](#) for the contact details.

Reasonable access to your personal data will be provided at no cost to you upon request made to Allego at dpo@allego.eu. If access cannot be provided within a reasonable time frame, Allego will provide you with a date when the information will be provided. If for some reason access is denied, Allego will provide an explanation as to why access has been denied.

5. Security of your information

To help protect the privacy of data and personally identifiable information you transmit through use of the Smoov app, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your personal data to those employees who need to know that information to provide benefits or services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

6. Changes and updates to this Privacy Notice.

As our services and use of technology may change from time to time, this Privacy Notice is expected to change as well. We reserve the right to amend the Privacy Notice and at any time, for any reason, without notice to you, other than the posting of the amended Privacy Notice on our website <https://www.smoovapp.eu/>. We can push reminders of our Privacy Notice through the Smoov app, but you should check our Site frequently to see the current Privacy Notice that is in effect and any changes that may have been made to it.

7. Questions, comments or complaints

If you have any questions or comments about the Smoov app's privacy notice or if you would like to have information about the personal data stored about you, please contact us:

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