

# PRIVACY POLICY

*It is important to us that you feel safe with the processing of your personal data that takes place within CheckWatt, which is why we process your personal data with the utmost regard for your privacy and that you should have control over it. Our guiding principles for our work on data protection are simple; we are transparent about what data we collect and why and process your personal data based on the requirements set out in the General Data Protection Regulation (GDPR) and other legislation applicable at any given time, case law, and general advice regarding personal data ("Applicable Legislation"). The following describes, among other things, how we process your personal data.*

*For the Swedish version of this statement, follow this [\[link\]](#).*

## **Who is responsible for your personal data?**

- CheckWatt AB, 556824-9014, ("CheckWatt") is the data controller and responsible for CheckWatt's processing of your personal data.

## **Why do we process your personal data?**

- We mainly process your personal data in order to deliver, perform and improve our products and services and offer the best possible service and offers.
- We process your personal data in order to perform our services under a contract with you as a customer or partner or in your capacity as employee or consultant of a customer or partner.
- The personal data may be processed in order for us to keep statistics and conduct research to improve our products and services or to market them to you.
- In addition, personal data may be included in information that we are required by law to provide to authorities or others or for

various measures (e.g. accounting and reporting) that we are required by law to take.

- Other examples of why we process your personal data include administering your contacts with us, administering invoicing and payment, confirming your identity and verifying your personal, contact and delivery details, providing maintenance, support and service including handling any comments and complaints, contacting you as a contact person for, for example, our subcontractors, establishing, exercising or defending legal claims, processing any defaults and detecting and preventing fraud, misuse, hacking attempts, cyber attacks and other improper use.

## **When do we have the right to process your personal data?**

- Your personal data will only be processed by us when we have a lawful basis for this under Applicable Legislation. This is the case when we process your personal data in the performance of our contract or other commitment to you or to you as an employee or consultant of a customer or partner of ours, if you have consented to the processing, if we have a legitimate interest in the processing, or if the processing is done due to a legal obligation.

## **What personal data is processed and from where is it collected?**

- The following are examples of personal data that we process. Personal and contact information such as name, personal identity number, invoicing and delivery address, email address, mobile phone number, installation ID, information about electricity supplier, payment information such as billing information and bank account number, property unit designation, IP address, purchase history, electricity consumption, content of messages to and from us sent via various communication services or other personal data necessary to offer you the best service and to be able to assist you in case of any questions and fulfil our obligations to you.

- The personal data that we process about you consists of personal data that you provide to us directly or indirectly in the course of your contacts with us, including, among other things, ordering our services and purchasing products and using our services. We may also receive personal data about you from your various contractual partners where an exchange of information is required for the provision of our services. In addition, we may receive your personal data when you visit our websites, use the CheckWatt webshop, the EnergyInBalance platform and other communication channels used in your dealings with us.
- We also process personal data that we collect when conducting analytics and customer surveys to improve our services and your customer experience.
- In cases where it is necessary in order to fulfil our contract with you or if there is another legal requirement for us to do so, we process your personal identity number. We do not process any sensitive personal data about you and other data worthy of protection (for example about your finances) is only processed when it is needed for special purposes (such as to grant you credit).
- Our website uses small text files, so-called cookies, to improve your experience and to make the website work.

## **Who has access to your personal data?**

- Only those persons within CheckWatt and with our subcontractors who need your personal data to achieve the purposes for which the personal data is intended will have access to your personal data.
- We do not disclose personal data to other companies or authorities unless we are required to do so under contract, law, regulation or official decision or to protect our rights or the rights of third parties or if disclosure to third parties is part of our commitment to you. We never pass on or sell your personal data to third parties for marketing purposes without your consent.
- In the event of a merger, consolidation, restructuring or sale of substantially all shares and/or assets or other reorganisation,

personal data may be disclosed to subsequent owners, part-owners and their advisors in connection with the reorganisation.

## **Transfer to third country**

- Your personal data will not be transferred to countries outside the EU/EEA unless specifically stated in connection with your submission of your personal data to us.

## **How long do we save your personal data?**

- We do not save your personal data for longer than is necessary to fulfil the purposes of processing your personal data. This means that we delete your personal data according to Applicable Legislation.
- Personal data processed as part of a customer or supplier relationship is normally saved for up to two years after the customer or supplier relationship has ended beyond the processing required in the context of accounting or other legal obligations and if there is otherwise a legitimate interest.

## **What are your rights?**

- We are committed to ensuring that you are aware of your rights and that you can contact us at any time to exercise the rights set out below. Under the heading “Contact details” below you will find information on where to turn.

### ***Right to withdraw consent***

- You have the right to withdraw your consent at any time. If you wish to withdraw your consent, please contact us as soon as possible. Withdrawal of consent does not affect the lawfulness of processing operations carried out before the withdrawal.

### ***Right to request access to personal data***

- You have the right to access your personal data processed by us (register extract). We are always open and transparent about how we process your personal data and if you want to confirm

whether your personal data is being processed or get a deeper insight into what personal data we process about you, you can request access to the data. At the same time, you will then receive information about the purposes of the processing, the personal data processed, the recipients or categories of recipients to whom the personal data have been or will be disclosed and, if possible, the anticipated period for which your personal data will be stored or the criteria used to determine the period. Information about additional rights is provided at the same time and you will receive a copy of the personal data being processed.

### ***Right to rectification of personal data***

- You have the right to request that your personal data be corrected without undue delay if it is incorrect. You also have the right to complete any incomplete data.

### ***Right to erasure of personal data***

- You have the right to have your personal data erased without undue delay if, for example, they are no longer necessary for the purpose for which they were collected or otherwise processed, if you withdraw your consent, if they were processed unlawfully, if you object to the processing and there are no overriding legitimate grounds for the processing, or if the personal data must be erased to comply with a legal obligation, as long as there is no reason under applicable law that makes the processing necessary. For example, processing may be necessary for the exercise of the right to freedom of expression and information, for the fulfilment of a legal obligation, for the performance of a task in the public interest or for the establishment, exercise or defence of legal claims.

### ***Right to restriction of processing***

- You have the right to restrict our processing of your personal data. If you contest the accuracy of the personal data, you may request a restriction of processing for the period necessary to verify your personal data. You can also request restriction of processing if the processing is unlawful and you oppose the

erasure of the personal data, if the personal data is no longer needed for the purposes of the processing but you need them for the establishment, exercise or defence of legal claims or pending verification of whether our legitimate grounds override your legitimate grounds.

### ***Right to object to certain types of processing***

- You always have the right to object to any processing of personal data based on a weighing of interests. We may no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims. You have the right to object at any time to processing for direct marketing purposes, in which case the personal data will not be used for such purposes.

### ***Right to data portability***

- Under certain conditions, you have the right to have your personal data transmitted to another data controller in a structured, commonly used and machine-readable format, where technically feasible, known as the right to data portability. This applies when the processing of your personal data is based on consent or on a contract and the processing is automated.

### ***Right to lodge a complaint***

- If you believe that we have processed your personal data incorrectly, you have the right to lodge a complaint with the relevant supervisory authority for the processing of personal data (in Sweden, the Swedish Authority for Privacy Protection (IMY)).

## **Contact details**

- If you have any questions, wish to exercise any of your rights or believe that your rights are not respected by us, you are always welcome to contact us at the contact details below.

- CheckWatt AB  
Gamlestadsvägen 18B  
415 02 Gothenburg

Email: [support@checkwatt.se](mailto:support@checkwatt.se)

## **Changes to Privacy Policy**

- This Privacy Policy is available on our website [www.checkwatt.se](http://www.checkwatt.se). We may, from time to time, need to update this policy. Our latest version of the Privacy Policy is always published on our website.

*This Privacy Policy has been updated as of 25 September 2024.*