

## Privacy Statement

**In addition to a safe environment for our technicians, safety is also our number 1 priority in the provision of our services to clients. We provide that safe environment not only by ensuring safe energy supply, but also by properly handling their personal data. In order to fulfil our duties, the use of personal data is inevitable. We feel it is important to handle personal data with due care and integrity, and we are open and honest about what we do with that data. This privacy statement provides you with information on the type of personal data that we collect from you and the purposes for which we use it. Together, we work on a safe and reliable environment.**

This privacy statement was last updated on 9 November 2022.

### What does Fudura do?

Fudura acts as the link between businesses and energy. Every day, we help businesses make smarter and better use of energy. By providing metering services, data-driven services as well as infrastructure services, we help Dutch trade and industry become more sustainable. We believe in a world where energy is handled fairly and efficiently.

### Legal obligation

We value confidential handling of your data for moral reasons. But we also have a legal obligation to do so. As a recipient of personal data, our handling of those data must comply with all the rules of the General Data Protection Regulation (GDPR) and the Dutch GDPR Implementation Act. The Dutch Data Protection Authority (DPA) monitors whether businesses are compliant with the GDPR. The Dutch Electricity and Gas Acts also include provisions on how to handle confidential data. Only then can we improve the protection of everyone's privacy.

### When do we process personal data?

If you use Fudura services or products or you visit our website, we may process (your) personal data. 'Processing of personal data' means the collection, recording, storage, use, transmission, dissemination, making available and/or combination of the data. According to the GDPR, personal data is all such data as relates to an 'identified or identifiable natural person'. You as our client or business relation may be among that group.

## Why do we need personal data?

In order to fulfil our duties, the use of personal data is inevitable. We need your data, among other things, for:

- handling the information requested by you;
- entering into and performing an agreement with you;
- complying with laws and regulations;
- further information on current developments;
- improving our services;
- conducting customer satisfaction surveys;
- securing and improving our website.

## Best possible protection

In line with the GDPR, we protect your personal data based on the following step-by-step approach:

### 1. Effective use

#### *Only if necessary*

We only process those personal data that is necessary for the performance of our work.

#### *Never store longer than necessary*

We do not store personal and company data any longer than necessary to achieve the purpose for which we process your data. We may, however, sometimes be required to retain your data for longer, for example based on tax or other legislation. After expiry of the retention period, we destroy the personal data or retain it in anonymous form, so that it can no longer be traced back to any individual person.

### 2. Basis

We process your personal data only on the bases referred to in the GDPR. If we process your personal data on the basis of your consent, you will at all times have the right to access, correct, adjust or revoke that consent.

### 3. Safe repository

We store personal data in a safe place, taking all the necessary organisational and technical security measures to avoid abuse of, and unauthorised access to, personal data.

#### *Digital*

We set up an appropriate level of security for each application, in line with the Information Security Policy.

### ***Physical***

In order to prevent unauthorised access to our internal systems, we control access to our offices and electricity stations and gas stations. In addition, paper archives in our offices are secured and our employees store files under lock and key.

## **4. Authorised access only**

Only authorised persons and cleared parties have access to our locations where personal data of clients is processed.

### ***Access control internal staff***

Only employees who need personal data to perform their duties can access this data. Who can access what data and for what purpose is clearly defined in the form of authorisation levels and user profiles. We periodically assess whether these authorisation levels are still up to date.

### ***Sharing data with external parties***

Here at Fudura, we only share data with third parties if our business operations require this, if we are legally obliged to do so or if this follows on from another obligation. If we provide personal data to third parties, we do so in anonymous or aggregated form, where possible, so that it can no longer be traced to specific individuals or organisations. We do not sell personal data to third parties for our own commercial purposes.

### ***Necessary for business operations***

In order to achieve our objectives efficiently and effectively, we use parties, among other things, to process personal data for us. Those parties or agencies must have signed a data processing agreement stating the purpose for which they receive the data and for what purpose they can process it, as well as how they must protect the data. This way, we ensure that external parties handle personal data as carefully as we do.

### ***Legal obligations***

The energy market is regulated such that, in addition to the DPA regulations, it imposes certain obligations on us as a metering company and independent service provider. For example, we are legally obliged to share data with energy suppliers, national and regional grid operators and government authorities, among others.

### ***Other obligations***

Certain authorities may also require us to provide personal data. For example, to the police within the framework of fraud or a criminal investigation. We will only lend our cooperation in this respect if we are required to do so based on laws and regulations.

### ***Geographic protection***

In principle, Fudura only processes personal data within the EU. If any data processing operation takes place outside the EU, we will make contractual arrangements as referred to in the GDPR, to safeguard a similar level of privacy protection as that prevailing within the EU.

## **5. Duty of confidentiality**

Anyone with access to the personal data of clients at Fudura must handle it with due care. Employees are bound by the confidentiality statement, the compliance protocol and the Fudura code of conduct.

## **6. Your rights**

As a Fudura client, you have the right to access, correct, supplement and delete your personal data that is processed by us. You may submit a request to that effect to [privacy@fudura.nl](mailto:privacy@fudura.nl). We will respond to your request within four weeks.

### ***Right of access***

When you submit a request to access your data, we will show you what information of you we hold on record, for what purpose we use the data, how we obtained it and who may receive it.

### ***Right to rectification***

If personal data is incorrect or incomplete, you have the right to have it adjusted.

### ***Right of erasure***

If your personal data is no longer needed for the purpose for which it was collected, you can ask us to delete it. Only if we are legally obliged to store your data (for example for the tax authorities), we will not be able to honour your request.

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

At your request, we must transfer all your personal data held on record by us to you or an organisation of your choice. Note that the legislation does impose certain restrictions. We will render our assistance to this transfer wherever possible.

## **Cookies**

When you visit our website, we use cookies to process personal data. We use cookies that are necessary for the website to perform properly. We may, however, also use cookies to ensure optimum performance by our website. It is up to you to choose what cookies the website may use. See also our *cookie statement* on the website.

## For whom?

This privacy statement applies to all clients, potential clients and other business relations of Fudura. The Fudura website may use 'links' to refer to some other organisations. These organisations do not come under this privacy statement. They make their own arrangements on how they handle your personal data. If you have any questions about how we handle your personal data, please send a message to [privacy@fudura.nl](mailto:privacy@fudura.nl). If we are unable to resolve the situation, you can contact the Data Protection Officer (DPA). This authority supervises compliance with the statutory regulations for the protection of personal data. Go to <https://autoriteitpersoonsgegevens.nl> for information on how to contact the Dutch Data Protection Authority. Fortunately, this is rarely necessary. We will always endeavour to find a proper solution in consultation with you.

## Questions?

If you have any questions about how we handle your personal data, please send a message to [privacy@fudura.nl](mailto:privacy@fudura.nl). If we are unable to resolve the situation, you can contact the Data Protection Officer (DPA). This authority supervises compliance with the statutory regulations for the protection of personal data. Go to <https://autoriteitpersoonsgegevens.nl> for information on how to contact the Dutch Data Protection Authority. Fortunately, this is rarely necessary. We will always endeavour to find a proper solution in consultation with you.

## Changes

This Privacy Statement is subject to change. You will always find the most recent version of this Privacy Statement on the website.