

---

## Privacy Policy

### 1. Introduction

Your Personal Data protection is very important to Elekeeper Co., Ltd. and its subsidiaries and branches (referred to as “we” or “**Company**” hereinafter). This Privacy Policy outlines the types of Personal Data we may collect from you when you use this System and how we will use and protect such Personal Data. We may also act as a data processor processing Personal Data collected or obtained through third parties. We will process such Personal Data in accordance with applicable European Union and its member states’ data protection laws, especially the General Data Protection Regulation No. 2016/679 (referred to as “**GDPR**” hereinafter). This Privacy Policy reflects the relevant principles of the GDPR.

We respect your data subject rights and privacy rights, and we will endeavor to ensure the security and reliability of your Personal Data. When processing your Personal Data, we will comply with applicable European Union and its member states’ data protection laws and take appropriate measures to protect your Personal Data from unauthorized access and improper use.

For the purposes stated in Section 2.1 of this Privacy Policy, we need to collect, use, transmit, store, and/or otherwise process your Personal Data. Such Personal Data includes Personal Data about you contained in various forms and files of this System, as well as any other Personal Data you provide, we possess, acquire, obtain, or collect either currently or in the past. If you do not wish us to use your Personal Data in accordance with the provisions of this Privacy Policy, please refrain from providing us with your Personal Data. However, please note that in such cases, you may not be able to use our related services, as well as access and/or utilize certain functions of this System and the relevant App and manage your solar power plant equipment. After carefully reading and understanding the entire contents of this Privacy Policy, you can decide whether to authorize us to process your Personal Data and agree to assume the associated rights, obligations, consequences, and liabilities arising hereof.

Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy shall have the following meanings:

**Personal Data:** It refers to any information relating to an identified or identifiable natural person (“**Data Subject**”); an identifiable natural person is one who can be identified, directly or indirectly, particularly by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

**Special Categories of Personal Data:** It refers to Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data,

---

biometric data processed for the purpose of uniquely identifying a natural person, and data concerning a natural person's health, sex life, or sexual orientation.

**This System:** It refers to Elekeeper Smart EMS. The functionality of this System may be expanded or adjusted based on technological advancements and business development.

**Affiliated Companies:** It refers to companies, enterprises, and other economic organizations that have one of the following relationships with the Company: (1) Direct or indirect ownership or control in terms of capital, operation, purchasing, or sales; (2) Direct or indirect co-ownership or control by a third party; (3) Significant influence between the parties.

## **2. Our Collection of Personal Data Types and How We Use Personal Data**

### **2.1 Purposes of Collecting and Processing Personal Data**

We always process your Personal Data in accordance with the legal basis provided by the GDPR (such as Article 6 and Article 7 of the GDPR).

#### **2.1.1 Solar Power Plant Owners**

We may collect and process the Personal Data of the solar power plant owners for the following purposes:

- Providing solar power plant and equipment management services (such as solar power plant management, equipment management, inverter management, battery management, battery health management) for you or your company (if you are the user of an enterprise power plant).
- Providing solar power plant installation and operation-related services for you or your company (if you are the user of an enterprise power plant).
- Providing after-sales services for solar power plants and equipment (such as post-sales service, warranty check, work order management, work order evaluation and settlement) for you or your company (if you are the user of an enterprise power plant).
- Providing monitoring and remote configuration services, remote operating services and dispatchers control service for solar power plants and equipment for you or your company (if you are the user of an enterprise power plant).
- Providing solar power plant design services (such as solar power plant design management, component configuration, inverter configuration) for you or your company (if you are the user of an enterprise power plant).
- Notifying you of any changes to our services.
- Registering, managing, and maintaining your personal account, home power plant account,

---

and enterprise power plant account.

- Facilitating communication between us, as well as between partners (including distributors, installers, designers, dispatchers, etc.) of you or your enterprise (if you are the user of an enterprise power plant) and you.
- Informing you about our policies and terms.
- Managing user preferences.
- Displaying the performance report of your solar power plant.
- Show the geographical location and map of your solar power plant.
- Provide weather forecasts for the location of your solar power plant.
- Managing account, provide related services for you or your company (if you are the user of an enterprise power plant) and enhance personal data security, using personal and equipment data for data analysis, device monitoring and analysis, surveys, audits, etc.
- Business analysis purposes.
- Other purposes related to the products or services we provide to you or your company (if you are the user of an enterprise power plant).

In addition, with your prior explicit consent, we may collect and process your Personal Data for the following purposes:

- Providing you with information that you may find interesting.
- Subscription and management of commercial promotional emails.
- Sharing your information with partner companies (such as distributors, installers, designers, dispatchers) who can assist in managing your solar power plant, provide products or services to you, or establish contact with you or your company.
- Use for commercial promotion and marketing purposes.
- Providing you with visitor demo mode (if you use this system as a visitor).
- Notification push (including system notifications: system upgrades, service interruptions, maintenance notifications, etc.; activity notifications: invitations to seed users, etc.; service notifications: after-sales service progress updates; alarm notifications: reminders for machine abnormalities, etc.) and message management.

### **2.1.2 Distributors, Installers, Designers and Other Service Providers**

We may collect and process the Personal Data of the distributors, installers, designers and other services providers for the following purposes:

- 
- Registering, managing, and maintaining your account.
  - Providing better user experience and service functions (for example, remote upgrades, settings, and adjustments) to the solar power plant owners.
  - Facilitating you to provide the solar power plant management services to the solar power plant owners.
  - Facilitating you to provide the solar power plant installation services to the solar power plant owners.
  - Facilitating you to provide the after-sales services related to solar power plants and equipment to the solar power plant owners.
  - Facilitating you to provide the solar power plant design services to the solar power plant owners.
  - Enabling the contact between the solar power plant owners, your partners and you.
  - Notifying you of any changes in our services.
  - Informing you of our policies and terms.
  - User preference settings.
  - Managing account, providing related services to you, and enhancing the security of personal data, using personal and equipment data for data analysis, device monitoring and analysis, surveys, audits, etc.
  - Business analysis purposes.
  - Providing you with visitor demo mode (if you use this system as a visitor).
  - Other purposes related to the products or services provided to the solar power plant owners by us or you.

In addition, with your explicit consent, we may collect and process your Personal Data for the following purposes:

- Providing you with information that you may find interesting.
- Subscription and management of commercial promotional emails.
- Use for commercial promotion and marketing purposes.
- Notification Push (including system notifications: system upgrades, service interruptions, maintenance notifications, etc.; activity notifications: invitations to seed users, etc.; service notifications: after-sales service progress updates; alarm notifications: reminders for machine

---

abnormalities, etc.) and Message Management.

### **2.1.3 System Administrators, Business Support Staff, and Other Company's Inner Users**

We may collect and process the Personal Data of the system administrators, business support staff and other company's inner users for the following purposes:

- Registering, managing, and maintaining your account.
- Facilitating you to provide maintenance services for this System.
- Facilitating the communications between solar power station owners, our partners (such as distributors, installers, designers) and you.
- Notifying you of any changes in our services.
- Informing you of our policies and terms.
- User preference settings.
- Managing account, providing related services for you and enhancing personal data security, using personal and equipment data for data analysis, device monitoring and analysis, surveys, audits, etc.
- Business analysis purposes.
- Company operations and business management, marketing;
- Other purposes related to the products or services we provide to the solar power plant owners or service providers.

In addition, with your explicit consent, we may collect and process your Personal Data for the following purposes:

Notification Push (including system notifications: system upgrades, service interruptions, maintenance notifications, etc.; activity notifications: invitations to seed users, etc.; service notifications: after-sales service progress updates; alarm notifications: reminders for machine abnormalities, etc.) and Message Management.

## **2.2 Types of Personal Data Collected and Processed**

### **2.2.1 Solar Power Plant Owners**

We need to collect and use the following categories of the Personal Data of the solar power plant owners:

- Account login information, including owner and login name, user alias, creator, updater, update time, creation time, user ID, password, login IP, login IP address information, login time, login channel, system source, user type, user level, user status, user group, remarks, etc.

- 
- User identity information, including user avatar, name (or surname, given name), nickname, department affiliation, employee number, language, etc.
  - Contact information, including email, mailing address, postal code, fax, country, country code, time zone, city, etc.
  - Solar power plant-related information, including power plant name, power plant UID, power plant serial number, power plant type, usage type, plant capacity, commissioning time, power plant image, solar panel brand, related installer name, distributor code, electricity price, currency unit and symbol, meter serial number, grid connection type, investment method, owner's name, owner's email, owner's telephone, third-party-bound power plant ID, etc.
  - Power plant account-related information, including owner ID, organization ID, creator, creation time, updater, modification time, etc.
  - Solar power plant address-related information, including detailed address (including weather-related address), postal code, region (such as country name, province name, city name, district/county name, street/town name, village name, street type, foreign region remarks), region code (such as country code, province code, city code, district/county code, street/town code, village code), time zone, longitude, latitude, altitude, etc.
  - Solar power plant data and equipment data, such as current power, current efficiency, daily power generation, cumulative power generation, first power-up time, vendor source, rated power, machine type, shipment number, inverter model, alias, equipment serial number, inverter SN, plant of the inverter, module SN, battery SN, battery model, battery type, plant of the battery, report inverter and equipment statistics data (such as power generation, discharge, charging, power consumption), real-time data of equipment (such as the current, voltage, power of the energy storage machine, battery, and host; the temperature of battery).
  - Your Log Information we will collect when you use this System, such as login logs, operation logs.
  - IDFA, system operation information, network status information, IMEI, OAID, IMSI, application list information, base station information, social platform openID.

If you only use visitor demo mode to try to use this system, we will only collect your country/region, username and email to send you the latest news and marketing messages. You have the right to turn off the permission of the latest news and marketing message push. The account you log in in visitor demo mode is only a unified test account provided by us, and the power plant information in it is also a unified virtual information, not able to distinguish different users. Therefore, the account data involved in the visitor demo mode is not Personal Data.

Please note that we may automatically collect and process your solar power plant-related

information, solar power plant data and equipment data, etc. for the purposes described in this Privacy Policy once your solar power plant and equipment are powered on and connected to the network. If you do not agree with the above processing activities, please contact us immediately using the contact information provided in this Privacy Policy.

### **2.2.2 Distributors, Installers, Designers and Other Service Providers**

We need to collect and use the following categories of the Personal Data of the distributors, installers, designers and other services providers:

- Account Login Information, including owner and login name, user alias, creator, creation time, updater, update time, user ID (ID), password, login IP, login IP address information, login time, login channel, system source, ERP customer code, user type, user level, user status, user group, remarks, etc.
- User Identity Information, including user avatar, name (or surname, given name), department affiliation, employee number, language, etc. If you are the contact person of a distributor or an installer, we will collect the name of your company.
- Contact Information, including email, postal code, fax, city of residence, etc. If you are the contact person of a distributor or an installer, we also need to collect your role (installer or distributor), country of affiliation, country code, time zone information, etc.
- Location Information, including detailed address (including weather-related address), postal code, region (such as country name, province name, city name, district/county name, street/town name, village name, street type, foreign region remarks), region code (such as country code, province code, city code, district/county code, street/town code, village code), time zone, longitude, latitude, altitude, etc.
- Serviced Solar Power Plant Information, including total energy generated, total installed capacity, production today, production this month, production current year, etc.
- Your Log Information we will collect when you use this System, such as login logs, operation logs.
- IDFA, system operation information, network status information, IMEI, OAID, IMSI, application list information, base station information, social platform openID.

If you only use visitor demo mode to try to use this System, we will only collect your country/region, username, email, industry, and company to send you the latest news and marketing messages. You have the right to turn off the permission of the latest news and marketing message push. The account you log in in visitor demo mode is only a unified test account provide by us, and the power plant information in it is also a unified virtual information, not able to distinguish different users. Therefore, the account data involved in the visitor demo

---

mode is not Personal Data.

### **2.2.3 System Administrators, Business Support Staff, and Other Company's Inner Users**

We need to collect and use the following categories of the personal data of the system administrators, business support staff and other company's inner users:

- Account Login Information, including owner and login name, user alias, creator, creation time, updater, update time, user ID (ID), password, login IP, login IP address information, login time, login channel, system source, ERP customer code, user type, user level, user status, user group, remarks, etc.
- User Identify Information, including user avatar, name (or surname, given name), employee number, language, etc.
- Contact Information, including email, postal code, fax, city of residence, etc.
- Your Log Information we will collect when you use this System, such as login logs, operation logs.

Please note that individual power plant information, equipment information, and log information alone cannot identify specific data subjects. If such information is combined with other information to identify specific data subjects or used in combination with personal data, during the period of combined use, such information will be treated as Personal Data.

Unless specifically required by law in certain circumstances, we do not require you to provide us with any other Personal Data or Special Categories of Personal Data. If you voluntarily provide us or our partners with other Personal Data or Special Categories of Personal Data by uploading documents, pictures, videos, or other materials through this System, it signifies that you explicitly consent to the collection and processing of such data as described in this Privacy Policy and the relevant circumstances stated.

### **2.3 Methods of Personal Data Collection**

We primarily collect your Personal Data directly through this System. If you choose to provide us with your Personal Data by filling out forms in this System or through your electronic communication devices and internet browsers, we will directly or indirectly obtain your Personal Data. Some Personal Data may also be generated by this System, such as the User ID created for you when setting up a user account. If you entrust your installer or distributor to create an account, we will obtain your account information, such as username, email, country, time zone, and password, through your authorized installer or distributor. We ensure that your Personal Data is processed for the purposes specified in Section 2.1 of this Privacy Policy, and we process your Personal Data within the necessary scope to achieve the processing purposes.

---

### **3. Legal Basis for Processing Personal Data**

In most cases, we obtain your consent before conducting any data processing activities. However, there are instances where we process your Personal Data for the performance of a contract that you have entered with us. Additionally, we may process your Personal Data to fulfill legal obligations, protect the rights of data subjects, safeguard public interests, and pursue legitimate interests (such as improving our services, preventing fraudulent activities, and maintaining the safety of ourselves, consumers, and others).

### **4. Policy on Personal Data of Minors**

We do not provide services to individuals under the age of 16. If you are under 16 years old and unable to provide valid personal consent for the authorized use of Personal Data according to the domestic laws, we will not accept your registration. If we discover Personal Data of minors meeting such criteria, we will proactively delete such data. If you become aware that a child under the age of 16 has provided Personal Data to us, please immediately contact us using the contact information provided in this Privacy Policy.

### **5. Data Storage and Retention Period**

We make efforts to implement appropriate technical and organizational measures to mitigate the risks associated with data processing, in particularly the accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, transmission, storage, or other forms of processing Personal Data.

However, no system is completely secure, and we ask for your understanding that there is no “Perfect Security Measure” on the information network. Despite our best efforts, it is still possible that unauthorized access to your Personal Data may occur. Additionally, we may be deceived by unreliable, misleading, or illegal information as we cannot verify the truthfulness of others’ statements. In the event of such incidents, we will notify you in accordance with applicable laws and regulations regarding the incident and the potential impacts it may have. We will also provide you with information on the measures that can be taken if necessary.

Unless otherwise required or permitted by law, regulations, and regulatory requirements that allow for longer storage periods, we will only retain your Personal Data for the necessary period to achieve the purposes described in this Privacy Policy (including the requirements of litigation or audit procedures). Once we no longer need your Personal Data, we will immediately delete them. Under certain circumstances, we will irreversibly anonymize your Personal Data so that it can no longer be associated with you. In this case, we may use the anonymized data without further notice to you.

We use the following criteria to determine the need for storing your Personal Data:

- Fulfillment of service purposes related to you, maintaining corresponding service and business records, and addressing your potential business needs.

- Ensuring the security and quality of the services we provide to you.
- Your consent to longer retention periods.
- Other special agreements or legal provisions regarding retention periods.

## **6. Automated Individual Decision-Making**

Unless you try our AI Saving function as the owner of the solar power plant, we do not make any automated decisions based on the Personal Data we collect. Some of our services involve automated processes, such as account registration, email delivery and analyzing user behavior. However, these services are not based on individual profiling of Data Subjects.

We will combine the location, longitude and latitude of your solar power plant, your historical electricity usage data and local electricity pricing information to conduct the automated individual decision-making associated with the AI Saving function. Through the location, longitude and latitude of the plant, this System can obtain local weather conditions. Combined with the peak and valley value of the local electricity price and the user's usages habits, the system can automatically adjust the charging and discharging power of the equipment, achieving the effect of saving money. The decisions involved in the AI Saving function are completely automated, without human intervention. Due to reasons like the inaccurate original data used, the inaccurate data model or the imperfect algorithm, the automated decision-making results of AI Saving function may not be completely accurate and may cause consequences like increased electricity fees or equipment damage. In this regard, you can contact us in accordance with the contact information in this Privacy Policy or through the feedback page to request human intervention in the decision, express your opinions and oppose the decision of the automated decision-making. If you are still not satisfied, you can turn off the AI Saving function through "App"- "Battery"- "Working Mode". We also will improve our algorithms regularly.

## **7. How We Share, Transfer, and Disclose Your Personal Data**

### **7.1 Sharing or Authorized Access of Personal Data**

We only share or grant access to your Personal Data with our affiliated companies or partners; data processors; authorized distributors, installers, developers, and third-party service providers in the following circumstances:

- Sharing or granting access to your Personal Data with our Affiliated Companies for the purpose of company operations and related business activities, as well as fulfilling the contracts you have entered with us.
- Sharing your Personal Data for providing corresponding services, such as providing your Personal Data to cloud storage service providers for storage services.
- In order to provide you with better user services and user experience, we provide your

---

relevant personal data to third-party service providers through the SDK provided by third-party service providers through this system. For example, your geographic location information (latitude and longitude, precise location, rough location) and device identification information (IDFA, OAID) are provided to Google LLC. through the Google Maps SDK to provide you with map services; Your system operation information, network status information, IMEI, OAID, IMSI, application list information, base station information, social platform OpenID, geographic location are provided to Shanghai Youkun Information Technology Co., Ltd. through MobTeck SDK. If you use such services provided by third parties in our Services, you agree that your information will be collected and processed directly by them. (relevant to owners of the solar power plant, distributors, installers, designers and other services providers.) If you enable the "one-click money saving" function, we will also provide your power station location, latitude and longitude, and historical electricity consumption data to Alibaba Cloud Computing Co., Ltd. through Aliyun SDK, which will provide you with computing services in automated decision-making. (relevant to owners of the solar power plant)

- Sharing longitude and latitude of your solar power plant with Visual Crossing, to provide weather service for you. (relevant to owners of the solar power plant)
- Sharing your information with partner companies (such as distributors, installers, designers, and power dispatchers of your solar power plant) with your explicit consent. These third parties may assist in managing your solar power plant and use your prior personal data to provide products or services for you. (relevant to owners of the solar power plant)
- Sharing your information with solar power station owners, our cooperative companies (such as distributors, installers, designers) for the establishment of contact. (relevant to distributors, installers, designers, other services providers, system administrators, business support staff, and other company's inner users)
- In order to send you commercial promotional emails and provide you with business marketing information from our company through the third-party email user operations platform-Mailerlite, we share your Personal Data with Mailerlite. (relevant to owners of the solar power plant, distributors, installers, designers and other services providers)
- Sharing your Personal Data through the Elekeeper Open Platform System with developers which are authorized by you, with your explicit consent. (relevant to owners of the solar power plant)
- Disclosing your Personal Data in accordance with legal requirements, legal proceedings, litigation, and/or requests from public and governmental authorities in your jurisdiction or foreign jurisdictions, if required.

- Additionally, to protect rights, seek available remedies, enforce our user agreement, investigate fraud, or protect our business and users, we may disclose your Personal Data if we reasonably determine that such disclosure is necessary and reasonable.

If we share or grant access to your Personal Data to third parties for purposes other than those mentioned above, we will obtain your prior consent. You have the choice to refuse the provision of your Personal Data to third parties.

## **7.2 Transfer of Personal Data**

We do not transfer your Personal Data to any third-party companies, organizations, or individuals unless:

- We have obtained your explicit consent. We will inform you in accordance with the applicable laws and seek your explicit consent before transferring your Personal Data to the recipient.
- In the event of mergers, divisions, dissolution, bankruptcy liquidation of the Company, or similar circumstances involving the transfer of Personal Data, we will inform you in accordance with the applicable laws, and require the receiving party to continue to comply with this Privacy Policy. Otherwise, we will request the receiving party to obtain your consent again.

## **7.3 Public Disclosure of Personal Data**

In principle, we do not publicly disclose your Personal Data unless one of the following conditions is met:

- We have obtained your explicit consent. If you are the owner of the solar power plant and with your authorization, we or other authorized entities have the right to share your power plant information, power plant monthly report, power plant report, achievement etc. through large-screen display in reasonable areas such as our company or exhibition, or through Facebook, LinkedIn or other social platforms by generating pictures, we will disclose your plant name, power generation statistics, power consumption statistics, power generating achievements and environmental benefit achievements and other data through the large-screen or third-party platforms, for the purpose of displaying the company's sales situation and the overall operation status of the power stations, as well as promoting and advertising the company and its solar power station business. If you are the distributors and installers and share your serviced solar power plant information through Facebook, LinkedIn, or other social platforms by generating pictures, we will disclose your total installed capacity, energy generated, plant status/number and energy consumption through social platforms.
- To fulfill legal obligations or requirements from relevant regulatory authorities: If there are

any mandatory requirements under laws, regulations, or relevant regulatory authorities, we may publicly disclose your Personal Data.

## **8. How Your Personal Data Is Transferred Cross-Border**

We may transfer your Personal Data to other countries/regions for various purposes. For example, for storage purposes, we may transfer your data to cloud storage service providers in the United States. For operational and contractual purposes, we may access your Personal Data from China. For the operational and managerial activity of the Company, as well as the need to conduct relevant business and fulfill the contracts entered with you, distributors, installer and other partners in other countries/regions may access your Personal Data. For the provision of value-added services, we may transfer your data to third-party service providers in other countries/regions. Among these, some countries and regions where the data recipients are located have been determined by the European Commission to have an adequate level of data protection, while others have not yet been determined. [European Commission's list of countries with adequate data protection can be found at: [https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en)].

Please note that data protection laws and other laws in some countries or regions may not be as comprehensive as those in your country or region. When transferring data to data recipients in countries or regions that have not been determined to have an adequate level of data protection by the European Commission, we will use various legal mechanisms (including the standard contractual clauses issued by the European Commission under Commission Implementing Decision 2021/914) (COMMISSION IMPLEMENTING DECISION (EU) 2021/914) to help protect your rights and ensure that your data receives sufficient protection in those countries or regions. You can contact us through the provided contact information in this Privacy Policy to request copies of your transferred Personal Data, copies of the standard contractual clauses, or for other further information.

## **9. System Permissions and Access Control**

You understand and agree that, during the use of this system, we may, when necessary, request access to system permissions on your device (specific permissions may vary depending on the device model and operating system you use) to collect and use the Personal Data associated with those permissions. The specific permissions are as follows:

- With your consent to access the camera permission, you can upload, take photos/images/videos, and perform functions such as posting reviews, scanning bar codes, creating avatars and taking fault images/videos.
- With your consent to access the photo album permission, we are authorized to access the content of your photo album or add content to your photo album so that you can upload, edit,

or modify your avatar, upload fault image/video, and upload files.

- With your consent to access the location permission, you can locate the latitude and longitude of the solar power plant, and use related functions such as solar power plant map display and weather display, address adding.
- With your consent to access the Bluetooth permission, you connect and access Bluetooth devices for device network allocation, device local mode.
- With your consent to access the personal hotspot permission, you can connect to your solar power plant and inverter through WIFI.
- With your consent to access Push Notice, you can receive alarm push, system messages, service information and event messages.
- With your consent to access Email Push, you can receive our news and marketing mails.

Before enabling permissions, we will inform you of the purpose of enabling the permissions and seek your consent. If you do not agree, we will not enable the relevant permissions, and we will be unable to provide the services associated with those permissions. You can turn off specific system permissions through relevant options under the System Settings, or turn off specific function permissions in your device. However, your decision to disable permissions will not affect the prior collection and use of data based on your authorization.

If we intend to use your Personal Data for purposes not specified in this Privacy Policy or collect additional Personal Data not mentioned, we will obtain your consent separately through page prompts, pop-ups, or other means in accordance with the applicable laws.

## **10. Personal Data Subject Rights**

### **10.1 Rights You Enjoy**

As a data subject, you have the following rights regarding the collection and processing of your Personal Data by us:

- Right to Acquire the information We Processing: You have the right to obtain all necessary information about our data processing activities related to you.
- Right to Access Personal Data: You have the right to verify whether relevant Personal Data concerning you is being processed and, if so, you have the right to ask for accessing to your Personal Data or the copies of your Personal Data.
- Right to Rectification or Erasure of Personal Data: You have the right to rectify any inaccurate Personal Data and to complete incomplete Personal Data without undue delay. Additionally, in accordance with the provisions of GDPR, you have the right to have your Personal Data erased without undue delay in certain circumstances.

- **Restriction of Personal Data Processing:** In accordance with the GDPR, you have the right to request the restriction of processing of your Personal Data. When our processing activities are restricted, your Personal Data can still be stored but cannot be further used.
- **Right to Object:** In accordance with the provisions of the GDPR, you have the right to object, on grounds relating to your specific situation, to the processing of your Personal Data, including data analysis. If the processing of Personal Data is based on your consent, you have the right to withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.
- **Right to Data Portability:** In accordance with the provisions of the GDPR, you have the right to receive your Personal Data in a structured, commonly used, and machine-readable format and have the right to transmit those data to another controller without hindrance from us.
- **Right to Not Be Subject to Automated Decision-Making:** In accordance with the provisions of the GDPR, you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

## **10.2 How to Exercise Your Rights**

If you wish to exercise the above rights, you can access, copy, or rectify your Personal Data, cancel your personal account through this System functions, or review and update your privacy settings through relevant options under System Settings of this System. You can also contact us through the contact method disclosed in this Privacy Policy or the Feedback function. We will provide you with feedback on the processing results within 15 days.

If you are not satisfied with our response, especially when our personal data processing behavior harms your legitimate rights and interests, you can also solve it through external channels such as complaining to the relevant regulatory authority.

For security purposes, you may be required to provide a written request or other means of identity verification. We will typically process your request after verifying your identity.

## **11. Cookies and Other Similar Technologies**

### **11.1 What is Cookie?**

Cookies, identifiers and related technologies are commonly used in the Internet industry. We or our third-party partners may collect your Personal Data by placing secure cookies, identifiers, and related technologies in order to provide you with a better user experience and services. We will not use cookies for any purpose other than those described in this Privacy Policy and the Cookie Policy of this System.

---

## 11.2 For what Purposes do we use Cookies?

**Strictly Necessary Cookies:** This kind of Cookies enable the proper functioning of our website and help us provide services related to website operations. The kind of Cookies could be placed automatically without your consent, but you can configure the settings on devices to block them. However, some functions of the website may not work properly if you do so.

**Analytical Cookies:** This kind of Cookies collect information about how users engage and interact with the website. If you disable these Cookies, we will not be able to understand how you interact with the website, and it may hinder us from optimizing the service experience of this System's Users.

**Privacy Preference Cookies:** These Cookies are used to remember your cookie settings when you visit our website. If you disable these Cookies, our website or App will not remember your privacy preferences, and you may be asked to provide them again.

## 11.3 What types of Cookies do we use?

The Cookies we use are as follows:

**Admin-Token:** This cookie serves as a user's credential during the visit, preventing the leakage of user information, avoiding repetitive logins, and reducing the number of transfers of the usernames and passwords. It belongs to the category of strictly necessary Cookies.

**\_gid, \_ga:** Used to understand how users interact with the website during their visits, these Cookies contribute to providing information such as visitor numbers, bounce rates, traffic sources, and other indications. It belongs to the category of analytical Cookies.

**cc\_cookie, gdpr cookie:** Used to store privacy preference configurations. It belongs to the category of privacy preference Cookies.

## 12. Processing that May Pose High Risks to Your Rights and Freedoms

We have established risk prevention and control mechanisms, and guidelines to detect data processing activities that may pose high risks to your rights and freedoms. If such data processing activities are identified, we will conduct an internal assessment to determine whether to stop the activity, ensure its compliance with GDPR, or implement appropriate technical and organizational

safeguards to continue the activity. In cases of doubt, the Company will consult with the data protection regulatory authority for their advice and recommendations.

### **13. How We Protect Personal Data**

We implement reasonable and feasible physical, electronic, and managerial measures to protect the security of Personal Data and prevent unauthorized access or improper use of Personal Data. For example, we have used encryption technologies (such as TLS encryption protocol) to ensure data confidentiality, and we have deployed access control mechanisms, etc.

We make every effort to ensure the security of any Personal Data you send to us. If the Company's physical, technical, or managerial protection measures are compromised, resulting in unauthorized access, disclosure, alteration, or destruction of Personal Data, we will promptly fulfill reporting, remediation, notification, and other measures. If your legitimate interests are compromised, we will actively assist the relevant authorities in their investigation to protect your legal rights and interests.

In the event of a Personal Data breach, tampering, loss, or other security incidents, we will promptly inform you in accordance with relevant laws and regulations. We will notify you of the causes of the security incident, the types of Personal Data involved, the potential risks, the remedial measures we have taken or will take, and recommendations for you to prevent and mitigate risks. We will inform you of the incident-related information through email, letters, phone calls, push notifications, or other reasonable and effective means. If it is difficult to notify you individually, we will make announcements in a reasonable and effective manner. Furthermore, we will proactively report the handling of Personal Data security incidents to regulatory authorities as required.

### **14. Controller's Identity and Contact Information**

Elekeeper Co., Ltd. is the data controller for the Personal Data collected through this System.

You can contact us using the following information:

Elekeeper Co., Ltd.

Address: Sanjing Innovation Park, No. 9 Lizhishan Road, Science City, Huangpu District, Guangzhou, Guangdong Province, China.

E-mail: [epay@saj-electric.com](mailto:epay@saj-electric.com)

E-mail for our Data Protection Officer (DPO): [dataprotection@saj-electric.com](mailto:dataprotection@saj-electric.com).

### **15. Updates to This Privacy Policy**

We may revise or update our Privacy Policy from time to time. The updated Privacy Policy will be effective upon its publication, and your continued use of our services through the App or Web will

---

constitute your acceptance of the updated terms. If we make changes that we consider to be significant, we will make reasonable efforts to notify you, and in necessary cases, we may request your consent.

If you have any questions or requests regarding this Privacy Policy, please contact us using the contact method provided in this Privacy Policy.