

## Emulate Energy

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### *Privacy Policy*

#### Definitions

##### *Account*

Shall mean the account created for you to access our Service or parts of our Service.

##### *Company*

Shall mean Emulate Energy AB, org. nr. 559257-6150, address: Scheelevägen 15, 223 70 Lund, Sweden.

##### *Consent*

The data subject's freely given, specific, informed, and unambiguous indication that signifies the agreement to the processing of personal data relating to him or her.

##### *Cookies and similar technologies*

Shall mean text files that contain a small amount of data and are downloaded on your device when you visit a website. Cookies are useful because they allow a website to recognize your device.

##### *Cross-border Processing*

When processing of personal data has a connection to more than one member state of the EU it is called cross-border processing.

##### *Data Controller*

Shall mean the individual or legal person who determines the purposes for which and the means by which personal data is processed. Emulate is the "Data Controller" of your personal data. We are responsible for how we collect, process, and store your data.

##### *Data Portability*

The right for data subjects to receive and transfer their personal data between data controllers if the personal data has been provided by the data subject, and the processing is based on a contract or consent.

## *Data Processor*

The natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

## *Device*

Shall mean any device that can access our Service.

## *Legal Basis*

Legal basis is one of the criteria for the lawful processing of data under the GDPR.

## *Legitimate Interest*

Legitimate interest is one of the legal bases and is stated in Art. 6 (f) GDPR. This legal basis can be used when the data controller can conclude that the processing is necessary for their legitimate interest and this interest can outbalance the data subject's interests and rights as data subjects.

## *Measurement Data*

Shall mean the data measured or generated during the use of Service provided or operated by us, and data measured or generated by the end-users equipment and made available to us in relation to the Service as well as metadata (such as location and timing of the measurement).

## *Personal Data*

Shall mean the data relating to a physical person who with this data can be identified directly or indirectly.

## *Personal Data Breach*

Shall mean any security incident that affects the confidentiality, integrity, or availability of personal data.

## *Processing*

Shall mean the actual usage of the personal data which can be anything from collecting, storing or destroying the personal data.

## *Processor*

Shall mean the natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

## *Right to Access*

The right to access gives individuals the right to obtain a copy of their personal data as well as other supplementary information.

## *Right to Erasure*

The right to erasure is also known as "the right to be forgotten".

## *Third Party*

Shall mean the natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

## *Usage Data*

Shall mean the data which is collected automatically: generated during the use of Service or from Service infrastructure itself.

## *Website*

Shall mean <https://emulate.energy>

## Company

Emulate Energy is a company with the mission to accelerate the global transition to clean energy. The company has created a software, that coordinates the electricity demand of end-user devices and turns the demand flexibility into virtual batteries. The virtual batteries are used to balance renewable energy production and energy demand and support the electrification of transportation and heat. Emulate Energy controls the consumption of devices to maximize the economic and environmental outcome for the end-users and electricity companies.

## Data Controller

Emulate Energy AB, org. nr. 559257-6150, address: Scheelevägen 15, 223 70 Lund, Sweden.

## Types of data collected

When you are using our Service we may ask you to provide us with certain personally identifiable information that we can use to contact or identify you. This information may include, but is not limited to:

- Address
- Email address
- First name and last name
- Data that you yourself provide to us
- Data related to the matter for which you contacted us and any other comments or questions you might have
- IP address
- Code for the electrical installation/facility number
- Customer number

## Usage data

Usage Data is collected automatically if you choose to accept tracking cookies when using the Service.

Usage Data may include information such as your Device's Internet Protocol address (e.g., IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device.

## Your personal data

We may use your personal data to provide and improve our Service, to manage your account, to perform a contract, to contact you, to provide you with news or special offers about our Service, to manage your requests, for business transfers or for other purposes.

The information that we process about you includes, but is not limited to:

- Company data: names, phone numbers, and email addresses of representatives of your company.
- Code for the electrical installation: a code for your electrical installation that the network operator uses to identify which installation is yours.
- Customer/end-user IP address
- Customer/end-user number/address, facility number/coordinates
- Measurement data, such as:
- Energy consumption data of connected devices
- Electric Vehicle: Position/coordinates, state of charge, connected/disconnected to charge station, charging
- HVAC (Heat, ventilation, air conditioner): indoor- and outdoor temperature, compressor speed
- Solar inverters and batteries: energy production, state of charge, charging/discharging
- Energy flows to/from the facility
- Your rights: If you exercise any of your rights under GDPR, we will keep a record of this and our replies.

## The legal bases and purposes to use your data

### Contract

- To assess your needs, provide you with a quotation and agree to a contract with you.
- To set up your account with us/with your electricity retailer, secure energy availability, apply the correct pricing, process consumption data, calculate charges and send invoices.
- To process payments, refunds and set up payment plans.

### Consent

Where you have provided consent, we will rely on that to process your information for the purposes set out at the time that the request for consent was made. You can change that consent at any time by contacting us, please email Shwan Lamei: [shwan@emulate.energy](mailto:shwan@emulate.energy)

### Legal obligations

We have various rules and legal obligations that as a business we must follow. We will process your information to fulfill these obligations.

### Legitimate interest

Where we or someone else has a legitimate interest, we'll ensure that our interest has been balanced against your rights and freedoms as an individual.

The same legal basis will be used when we need to improve our services, protect or improve our IT security and investigate or prevent violations of the law (e.g. through cookies and IP addresses, see specific information about cookies).

## Retention of your data

We will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your personal data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

## Access to your data

We may share your data with energy suppliers and other organizations providing the Service, financial organizations for payment processing and refunds, law enforcement organizations working on the detection, investigation, and prevention of crime, and enforcement of legislation.

We may also share your data in the following situations:

- For business transfers: in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- With affiliates: in this case, we will require those affiliates to honor this Privacy Policy.
- With business partners: to offer you certain products, services, or promotions.
- With other users: when you share personal information or otherwise interact in public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- *With your consent:* we may disclose your personal information for any other purpose with your consent.

## Transfer of your personal data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ from those from Your jurisdiction.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

## Disclosure of your personal data

If the Company is involved in a merger, acquisition, or asset sale, your personal data may be transferred. We will provide notice before your personal data is transferred and becomes subject to a different Privacy Policy.

Under certain circumstances, we may be required to disclose your personal data if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).

We may disclose your personal data in the good faith belief that such action is necessary to: comply with a legal obligation, protect, and defend the rights or property of the Company, prevent, or investigate possible wrongdoing in connection with the Service, and protect the personal safety of users of the Service or the public, protect against legal liability.

## Security of your personal data

The security of Your Personal Data is important to us, but no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security.

## Children's privacy

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and you are aware that your child has provided us with personal data, please contact us. If we become aware that we have collected personal data from anyone under the age of 13 without verification of parental consent, we take steps to remove that information from our servers.

If we need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.

## Cookies that we use

We use the necessary cookies to make our site work. Necessary cookies enable core functionality such as security, network management, and accessibility. You may disable these by changing your browser settings, but this may affect how our website functions.

Statistic cookies help us to understand how visitors interact with our website by collecting and reporting information anonymously.

Cookie name	Cookie purpose description	Provider	Type	Expiry
_ga	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	emulate.energy	HTTP	2 years
_ga_#	Used by Google Analytics to collect data on the number of times a user has visited the website as well as dates for the first and most recent visit.	emulate.energy	HTTP	2 years



## Your rights

If we collect or handle your personal data, you have rights as an individual which you can exercise in relation to the information we hold about you.

If you'd like to express one of your rights, please email Shwan Lamei:  
shwan@emulate.energy

- Right of access to your personal data

You can find out if we hold any personal data about you, and access that data, by making a 'subject access request' under GDPR. Protection Regulation. If we do hold your personal data, we will provide you with a copy and information about what we do with it. Unless you ask us to provide it in a different way, we will email this to you where you have given us an email address. You can request access to our data by contacting Shwan Lamei:  
shwan@emulate.energy

- Right to withdraw your consent

You can withdraw your consent at any time by contacting Shwan Lamei:  
shwan@emulate.energy

- Right to correct any mistake, restrict or stop processing your data

You can make a request about the correction of any mistake, or restriction of processing your data. You may also ask us to stop processing your data or delete it.

- Right to transfer your data

You can require that we provide the data we hold about you either to you or a third party in a commonly used format.

- Right to complain

You may complain about the processing of your personal data to the Swedish Authority for Privacy Protection, IMY <http://imy.se/en>