

Privacy Policy

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Document Owner*	Sonny Strömberg

* Responsible for maintaining the policy and ensuring compliance across all relevant teams

Revision History

Version	Date	Person	Activity
1.3	July 2, 2025	Sonny Strömberg	Approved version - no changes from version 1.3 (Draft)
1.3 (Draft)	June 23, 2025	David Sävenhed	Drafted a new proposal to ensure GDPR compliance. Added document header with metadata and revision history
1.2	November 27, 2022	Sonny Strömberg	First officially approved version

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: Scheeletorget 1, 223 83 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: Scheeletorget 1, 223 83 Lund, Sweden.

Data Protection Officer (DPO)

Emulate Energy has assessed the need for appointing a formal Data Protection Officer (DPO) in accordance with Article 37 of GDPR. Based on the nature, scope, and scale of our processing activities, we have determined that a formally designated DPO is not required. However, data protection responsibilities have been assigned to Sonny Strömberg, Chief Operating Officer, who serves as the internal point of contact for all privacy and data protection matters. Sonny also acts as the contact person for EU data subjects and supervisory authorities.

Processing records

We maintain an internal record of all personal data processing activities in accordance with Article 30 of the GDPR. This includes the purposes of processing, categories of data subject and personal data, recipients, international transfers, and the technical and organizational security measures in place.

Data Protection Impact Assessments (DPIAs)

For processing activities that are likely to result in high risks to the rights and freedoms of individuals, such as the use of location or behaviour data, we conduct Data Protection Impact Assessments (DPIAs) in accordance with Article 35 of the GDPR.

Below is an overview of the types of personal data we collect as part of our services.

Types of data collected

When you use our Service, we collect and process certain personal data, including but not limited to:

- Address
- Device identifiers
- Electrical installation code (facility ID) and customer number
- Data you provide us directly (e.g. through contact forms or support requests)
- Technical data from your connected devices, such as:
 - Power consumption
 - Indoor and outdoor temperature
 - Charging status and location of electric vehicle (EVs)
 - Historical energy usage (with or without optimization)
- Location data (e.g. coordinates of your home or EV)
- Login credentials for our customers portal
- Device credentials (e.g. username and password) entered during onboarding, stored securely and encrypted when necessary.

We collect this data to provide, maintain, and improve our services, and to ensure secure and optimized operation of your connected devices.

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 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 collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

We 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 process your personal data to deliver and improve our energy optimization services. This includes:

- Controlling selected electrical loads and energy sources in your home (as chosen by you) to reduce your energy costs.
- Visualize your energy usage and optimization in the user interface.
- Providing customer support, including communication between you, your energy provider, and our support team via our customer portal or other support channels.
- Improving our services through the use of anonymized data. This data is processed in a way that cannot be linked back to you and is never combined with other data that could identify you

We may collect and process location data from your EV to predict when it is likely to be at home and ready to charge. This helps us schedule your home's energy usage more efficiently and avoid overloading your electrical system. EV location data is stored as long as necessary for optimization purposes, and distance data may be stored in a simplified, non-identifiable format for up to one year.

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 at hello@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.

Privacy by Design and Pseudonymisation

Emulate energy implements privacy by design and by default in all its systems and services. Where appropriate, personal data is pseudonymised to reduce the risk of identification and enhance data protection.

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.

International data transfers and safeguards

Your personal data may be processed outside your country of residence, including outside the EU/EEA. In such cases, Emulate energy ensures that appropriate safeguards are in place to protect your data. These safeguards include Standard Contractual Clauses (SCCs) approved by the European Commission, adequacy decisions, or supplementary measures in line with the Schrems II ruling.



We do not rely solely on your consent to this Privacy Policy as a legal basis for international data transfers. Instead, we ensure that all transfers are compliant with applicable data protection laws and that your rights remain protected.

Disclosure of your personal data

If Emulate energy 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 Emulate energy, 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.

Data Breach Notification Procedures

In the event of a personal data breach affecting personal data processed by Emulate energy on behalf of its customers, Emulate energy will notify the relevant customer (data controller) without undue delay, in accordance with Article 33(2) of the GDPR.

The customer, as the data controller, is responsible for assessing the risk of the breach and, where necessary, notifying the relevant supervisory authority within 72 hours and informing affected data subjects without undue delay, in accordance with Article 33 and 34 of the GDPR.

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

Cookie consent and withdrawal

Emulate energy uses a granular cookie consent mechanism that allows users to accept or reject different categories of cookies. Consent is obtained through a clear and unbundled interface, and users can withdraw or modify their preferences at any time via the cookie settings panel.

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 us at hello@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 emailing us at hello@emulate.energy.

- Right to withdraw your consent



You can withdraw your consent at any time by emailing us at hello@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>