PRIVACY POLICY

1. Terms used in the Privacy Policy

- 1.1. **SimpleCharge** Limited liability company "SimpleCharge", Reg. No. 40203353503, address: "Sengauja", Iļķene, Ādažu novads, Latvija, LV-2103.
- 1.2. GDPR Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
- 1.3. **Personal data** any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as the person's name, surname, identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 1.4. **Personal data processing** any operation or set of operations which is performed on Personal data or on sets of Personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 1.5. **Controller** a natural or legal person which, alone or jointly with others, determines the purposes and means of the processing of Personal data.
- 1.6. **Processor** a natural or legal person, public institution, agency or any other structure which processes Personal data on behalf of the Controller.
- 1.7. Client a natural or legal person which in person or remotely is receiving SimpleCharge provided services or has bought or is in the process of buying SimpleCharge offered products, as well as any visitor of the website www.simplecharge.lv.
- 1.8. **Cooperation partner** a natural or legal person which provides services to SimpleCharge and does not process Personal data in the possession of SimpleCharge and on behalf of SimpleCharge.
- 1.9. **Data subject** directly or indirectly identified or identifiable natural person, including all SimpleCharge Clients, Cooperation partners and their indicated contact persons, guarantors or trustees.

2. General provisions

2.1. This is the privacy policy (henceforth – Privacy Policy) of SimpleCharge, namely, Limited liability company "SimpleCharge", Reg. No. 40203353503, address:

"Sengauja", Iļķene, Ādažu novads, Latvija, LV-2103. These are internal rules, which are designed to provide information on SimpleCharge Personal data processing purposes, legal basis, scope, protection, processing and storage periods, Personal data recipients, and Data subject's rights during data acquisition and processing.

- 2.2. Privacy Policy is applied to the protection of privacy and Personal data regarding:
 - 2.2.1. natural persons, namely, SimpleCharge Clients and Cooperation partners, as well as third parties, who, in the context of information provided by Data subjects during the provision of SimpleCharge services or cooperation have been identified as contact persons or trustees;
 - 2.2.2. legal persons, if their name consists of a natural person's Personal data or if by the legal person's provided information it is possible to directly or indirectly identify a natural person.
- 2.3. Privacy policy applies to Personal data processing, regardless of the form and/or context in which the Data subject provides Personal data (in writing, orally, by telephone, through a website, in paper or by email, etc.), and in which SimpleCharge systems or forms they are processed.

3. Information about the Controller

- 3.1. The Controller is SimpleCharge: Limited liability company Limited liability company "SimpleCharge", Reg. No. 40203353503, address: "Sengauja", Iļķene, Ādažu novads, Latvija, LV-2103, e-mail: info@simplecharge.lv
- 3.2. For questions related to the SimpleCharge processing of Personal data, contact the SimpleCharge designated person for the processing of Personal data or send a message to the electronic mail address: info@simplecharge.lv. By using this contact information, the Data subject may request information about the processing of their Personal data in accordance with article 11.2. of this Privacy policy.

4. Legal basis for Personal data processing

- 4.1. To process Personal Data, SimpleCharge must determine the purpose and legal basis for processing Personal Data.
- 4.2. SimpleCharge may process Personal Data on one of the six legal bases set out in Article 6 of the GDPR. Still, in practice, the following legal bases are the most commonly used:
 - 4.2.1. consent of the Data Subject (Article 6(1)(a) GDPR);
 - 4.2.2. the conclusion and performance of a contract (Article 6(1)(b) GDPR);
 - 4.2.3. compliance with legal obligations imposed by external laws and regulations (Article 6(1)(c) GDPR);
 - 4.2.4. the pursuit of legitimate interests of SimpleCharge (Article 6(1)(f) GDPR). In pursuing the legitimate interests of SimpleCharge, the interests of the company are weighed against the rights of the Data Subject before the processing of Personal Data is carried out so that the legitimate interests of SimpleCharge of a commercial nature do not conflict with the interests and freedoms of the Data Subject. This legal basis will be used, for example, to apply to public administration, law

enforcement and judicial authorities to protect the company's legitimate interests. Data subjects shall be entitled at any time to request the suspension of such data processing in accordance with Section 11.1. of the Privacy policy.

4.3. The following table 1.1. reflects all the cases when Data subject's Personal data and other information provided by the Data subject may be stored and processed by SimpleCharge, which may be considered as Personal data in cases where it is possible to directly or indirectly identify the Data subject and are used for the following purposes:

Purpose	Categories of Personal Data	Legal basis			
Conclusion and administration of contractual relations: comprising and concluding a contract with the Client and for performance and modification of the contractual obligations after the conclusion of the contract, for the purposes of providing services / selling products, comprising and sending out invoices, as well as for communication purposes with the Data subject before and during the provision of services.	Name and surname, the position and place of employment, in certain instances personal identification number, phone number, electronic mail address, written or electronic signature, bank account, Address of where Client wants to put charging point, supporting documents of being associated with the represented organization, purchase history, sent attachments through communication, e-mail communication content, complaints (including data subject complaints), any other requests made by the Data subject.	 Conclusion and performance of a contract. (Article 6(1)(b) GDPR) Data subject's consent. (Article 6(1)(a) GDPR) Only applicable to processes where Data subject's consent is necessary, e.g., sending of complaints, messages or communication outside of the scope of contract, or requests for exercising Data subject rights in regards to personal data protection. 			
For maintaining SimpleCharge website www.simplecharge.lv and to ensure it's function, book meetings with clients, provide price calculations and preparation of offers, to administer incoming messages from website's email form and reply.	E-mail address, address of where Client wants to put charging point, date and time of set meeting, information about the meeting topic, job title, represented organization, content of sent message, including sent attachments through communication, Information gathered from displayed cookies on Client's device (For more information, please visit Section 12 – Cookies)	 Data subject's consent. (Article 6(1)(a) GDPR) Legitimate interest (Article 6(1)(f) GDPR) To maintain website's functionality is a legitimate interest of SimpleCharge, including deploying necessary cookies that ensure the functioning of the site. 			

Table 1.1.

Communication: Collecting and processing questions, suggestions, complaints, and other information to prepare replies and ensure communication with the addressee/submitter. Communication may be by e-mail, post, telephone, face-to-face or through the website <u>www.simplecharge.lv</u> (depending on how Data subject contacts SimpleCharge).	Data subject's e-mail address, job title, represented organization, content of sent message, including sent attachments through communication, telephone number.	• Data subject's consent. (Article 6(1)(a) GDPR)
Record-keeping: ensuring record- keeping and storage of documentation (including outgoing and incoming correspondence, contracts, etc.).	Documentation, e-mail, correspondence, contracts containing Personal Data, VAT number, legal address of organisation represented by client, invoices and Personal Data within.	• Legitimate interest (Article 6(1)(f) GDPR) Depending on the type of documentation, we may keep it to pursue a legitimate interest, such as defending an interest in court or to comply with legal requirements.
Commercial communications : We may inform interested parties about our news and developments related to our activities.	E-mail, name, surname, job title, represented organisation.	• Data subject's consent. (Article 6(1)(a) GDPR)
Recruitment : We process data for organizing and ensuring the recruitment process, establishing employment relationships etc.	Name, experience, education and other information in Data subject's CV, as well as cover letter.	 Data subject's consent. (Article 6(1)(a) GDPR) the person submits the information to SimpleCharge by actively participating in the selection process. Feedback from former employers is collected based on consent. Conclusion and performance of a contract. (Article 6(1)(b) GDPR) In an employment relationship - contract of employment and regulatory requirements (e.g. Employment law).

5. The source for acquisition of Personal data

- 5.1. Data subject's Personal data which are processed by SimpleCharge have been obtained from the following sources, in accordance with respective legal basis for processing Personal data as provided in Section 4 of the Privacy policy:
 - 5.1.1. Personal data which are submitted by the Data subject in person or remotely, namely, by using electronic mail, phone or any other remote communication channel;
 - 5.1.2. public registers, databases and publicly available information systems, for instance, public databases of the Register of Enterprises of the Republic of Latvia and Lursoft database;
 - 5.1.3. Personal data submitted by the Cooperation partner, its representatives, trustees or persons who are delegated to perform the service;
 - 5.1.4. information provided by a third party, if receiving such information has been established by effective regulatory acts.

6. Personal data processing at SimpleCharge

- 6.1. Personal data shall be processed in good faith, lawfully and in a transparent manner for the Data subject, using the organizational, financial and technical resources reasonably available to SimpleCharge.
- 6.2. Personal data are obtained for specific, explicit and legitimate purposes and their further processing is not for unintended purposes or in a manner incompatible with provided purposes.
- 6.3. Personal data shall be stored in such a way that one may identify the Data subject for no longer than is necessary for the purposes for which the data were collected or processed. Storage periods of SimpleCharge Personal data are set forth in Section 11 of the Privacy Policy.
- 6.4. Personal data is acquired by adhering to the principle of minimization of data processing, which means that the data is adequate, relevant and contains only that which is necessary for the purposes of processing.
- 6.5. SimpleCharge ensures the accuracy of Personal data and, if necessary, Personal data is updated according to current information or deleted.
- 6.6. Personal data is processed in such a way as to ensure adequate security of Personal data, i.e., protection against unauthorized or unlawful processing, accidental loss, destruction or accidental damage.
- 6.7. To ensure the fulfillment of obligations with respect to the Data subject, SimpleCharge is entitled to attract and authorize outsourced service providers to perform separate activities on behalf of SimpleCharge. If, in the course of these tasks, SimpleCharge partners process the Data subject's data at the disposal of SimpleCharge, the relevant partners or service providers shall be considered as Processors of Personal data at the disposal of SimpleCharge, and SimpleCharge shall have the right to transfer the Personal data of the Data subject to the Processors to the extent necessary for the performance of delegated activities.
 - 6.7.1. In cases where SimpleCharge authorizes the Processors to perform a specific task, both SimpleCharge and the Processors shall ensure the protection of the

processing of Personal data in accordance with the GDPR, and shall not use the Personal data for any other purpose than the fulfillment of contractual obligations in respect to the Data subject on behalf of SimpleCharge.

7. Processors of Personal data at the disposal of SimpleCharge

- 7.1. Information on the Personal Data of the Data Subject and the sub-processors of the Processors held by the Processors shall be provided by SimpleCharge upon receipt of the Data Subject's request in accordance with Section 11.2 of the Privacy Policy.
 - 7.1.1. SimpleCharge Processors may include service providers, such as, an accounting firm to provide accounting services for SimpleCharge.

8. Protection of Personal data

- 8.1. SimpleCharge protects Data subject's Personal data with the use of modern technology, taking into account the existing privacy risks and organizational, financial and technical resources reasonably available to SimpleCharge, including by the use of the following security measures:
 - 8.1.1. SimpleCharge uses an SSL-security certificate in operation of the www.SimpleCharge.lv Website, providing encrypted data transmission between the Data subject and the server on which the SimpleCharge internal IT systems are stored and Data subject's Data, which has been received through the Website;
 - 8.1.2. grants rights of access to the internal IT systems and databases of SimpleCharge only to a limited number of persons employed by SimpleCharge;
 - 8.1.3. provides access to the SimpleCharge work rooms only to employees employed by SimpleCharge;
 - 8.1.4. uses firewalls and antivirus programs;
 - 8.1.5. carries out regular and appropriate security checks against the occurrence of intentional attacks on information systems, databases, emails and servers maintained by SimpleCharge, and checks whether any leakage of data has occurred;
 - 8.1.6. ensures that persons who work with Personal data in the possession of SimpleCharge are properly trained, as well as have received appropriate and clear instructions regarding the processing of Personal data, including security instructions included in the Privacy Policy;
 - 8.1.7. ensure that no unauthorized or unlawful deletion, damage, loss, correction, processing, public disclosure or disclosure to third parties of Personal data is permitted;
 - 8.1.8. ensures that all paper format documents and confidential information is stored in a restricted availability location.

9. Transfer of Personal data to third parties

9.1. <u>www.simplecharge.lv</u> website, may place links to other websites, including websites of other Cooperation partners. SimpleCharge does not control and shall not be held

responsible for the content provided by a third-party website or Personal Data collected by a third-party website. For more information on third-party websites, please visit Section 14. of this Privacy Policy.

- 9.2. Personal data held by SimpleCharge is not transferred to third parties, except in the case mentioned in Article 9.1., as well as when:
 - 9.2.1. the data transfer to the third party concerned is required within the framework of a contract to perform a contractual obligation or legal obligation delegated by law;
 - 9.2.2. Data subject has given explicit, unambiguous consent to the transfer of its Personal data;
 - 9.2.3. to disclose Personal data is the obligation of SimpleCharge to persons specified in regulatory enactments at their reasoned request, in accordance with the procedures and in the amount prescribed by regulatory enactments;
 - 9.2.4. for the protection of SimpleCharge legitimate interests, for example, by applying to a court or other state institutions against a person who has infringed the SimpleCharge legitimate interests.
- 9.3. In case it is necessary or decided to transfer Personal data to third parties, SimpleCharge shall assess the security level of protection and processing of Personal data by the third party, to ensure the highest possible protection of the Data subject's information. SimpleCharge notifies Data Subjects of this change. Information on third parties who may receive Personal Data is available at request.

10. Personal data storage periods

- 10.1. SimpleCharge processes Personal data at its disposal for as long as the following conditions are met:
 - 10.1.1. During the execution of SimpleCharge provided services;
 - 10.1.2. while the contractual relationship with the Data subject is in effect;
 - 10.1.3. for as long as Personal data is required for the purpose for which they were received (for instance, when a recruitment process has finished, the CV's of Data subject's are deleted unless a consent from Data Subject is received for a longer storage period);
 - 10.1.4. or as long as necessary to ensure the fulfillment of legitimate interests of SimpleCharge or the Data subject, such as the ability of SimpleCharge or the Data subject to file an objection or to bring an action in court, as a defendant to defend their rights;
 - 10.1.5. while one of the parties has a legal obligation to store the data, for example in accordance with the Labor Law, Civil Law or the law "On Accounting".
- 10.2. When none of the conditions mentioned in Section 10.1. can no longer be applicable, Personal data is erased.
- 10.3. Paper-based documents are stored in a restricted access location in accordance with the storage periods set out in regulatory enactments, but not longer than 10 years, as well

as to ensure the legitimate interests of SimpleCharge, such as performance of contractual obligations, debt collection, or in case of potential litigation

11. Rights of the Data subject to access their Personal data

- 11.1. The Data subject has the right to be informed about what Personal data is at SimpleCharge disposal in relation to the processing of Data subject's Personal data, and to request access to, correction, replenishment or deletion of their Personal data, to limit the processing, and to object to the processing of Personal data based on the legitimate interests of SimpleCharge, as well as to exercise the right to data portability, to the extent that SimpleCharge is able to provide it technically.
- 11.2. The Data subject may submit a request for the exercise of his rights, by submitting a request for exercising Data subject's rights to SimpleCharge e-mail addess: info@simplecharge.lv.
- 11.3. Upon the receipt of the Data subject's request, SimpleCharge verifies the identity of the Data subject, evaluates the request and executes it in accordance with regulatory enactments.
- 11.4. SimpleCharge shall send a reply to the Data subject's e-mail address within 30 days of receipt of the Data Subject's request by the person responsible for the processing of Personal data, or through postal services by signed-for mail. If there is a need to clarify the information or carry out a more detailed investigation before answering, the response may take longer than 30 days, depending on the content of the request, but not more than 60 days.
- 11.5. In cases where Personal data is processed on the basis of regulatory acts, on a contractual basis, or in order to implement the legitimate interests of SimpleCharge a request for deletion of Personal data may not be implemented, which shall be communicated to the Data subject within 30 days after SimpleCharge responsible person for processing Personal data has received a request to delete the respective data. The answer is provided with a clear, unequivocal justification for why it is not possible to carry out the deletion of Personal data. Conversely, upon receipt of a reasonable request for the deletion of Personal data, an appropriate deletion of Personal data within 30 days of receipt of the Data subject's request shall be ensured.
- 11.6. Disputes related to the processing of Personal data shall be resolved through negotiations between the Data subject and SimpleCharge. If the Data subject considers that the processing of Personal data violates the person's rights and interests in accordance with the applicable laws and regulations, the Data subject has the right to file a complaint to SimpleCharge responsible person for processing Personal data by submitting a filled-in complaint form, or straight to the Data State Inspectorate of the Republic of Latvia, address: Blaumaņa Street 11/13-11, Riga, LV-1011, Latvia, e-mail address: info@dvi.gov.lv.

12. Cookies

12.1. SimpleCharge informs that cookies are used to ensure the functioning of the www.simplecharge.lv website as well to improve user experience and to obtain user statistics.

- 12.2. Cookies are small files stored on Data Subject (hereinafter User) devices. At the time the User accesses SimpleCharge website, the system reads these cookies and adjusts the settings accordingly. Cookies can be compared to a key that User's browser requests for customized information. Cookies are also used for other functions, such as, for obtaining statistics.
- 12.3. The website may use the following cookies:
 - 12.3.1. **Necessary cookies:** provides customized website operation according to the choices made by the User, for instance, by saving the cookie policy approval. Cookies are required to enable the User to take full advantage of the features of the website and to navigate the site. Without these cookies, it is impossible to provide the services offered by the site to the User, they are essential for the functioning of the site
 - 12.3.2. **Preference and Statistics cookies**: Cookies do not collect personal data, the information is anonymous. Remembers User habits, such as the most visited pages and improves site performance, as well as analyzes usage and other activities.
 - 12.3.3. **Marketing cookies:** Used to place advertisements on a website that are related to the user's interests and Internet usage habits
- 12.4. Each cookie is given an expiry for the length of time it stores personal data and processes it. The cookie may also not have a specific running time, such cookie categories can be further subdivided into session and persistent cookies, which describe the nature and time of the cookie:
 - 12.4.1. **Session:** session cookies are placed for the duration of the site visit and the information obtained is not stored longer than the site visit session.
 - 12.4.2. **Persistent:** the information is placed and stored on the user's computer even after the site visit. The expiry time of storing the information may vary for each cookie.
- 12.5. The User has the right to control the amount of cookies being placed on the User's device, namely, the User has the right to disable cookies of the website that provide functions that are not related to the provision of the basic functions of the website, namely the necessary cookies.
 - 12.5.1. Unwanted cookies may be blocked by blocking them through the User's browser and managing cookies, upon visiting <u>www.simplecharge.lv</u> website and adjusting cookie settings. Information on disabling cookies in the most commonly used Internet browsers is available: <u>https://www.aboutcookies.org/</u>.
- 12.6. Type of cookies SimpleCharge uses in the website www.simplecharge.lv:

Cookie name	Provider	Category	Cookie purpose description	Туре	Expiry
cf_bm	hubspot.com	Necessary	This cookie is used to	HTTP	1 day

			distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website.		
bSession	ecom.wixapps.n et	Necessary	Necessary for measuring and reporting of website performance.	HTTP	1 day
bSession	engage.wixapps. net	Necessary	Necessary for measuring and reporting of website performance.	HTTP	1 day
bSession	simplecharge.lv	Necessary	Necessary for measuring and reporting of website performance.	HTTP	1 day
firebase:host:#.f irebaseio.com	static.parastorag e.com	Necessary	-	HTML	Persistent
hs	simplecharge.lv	Necessary	Ensures visitor browsing- security by preventing cross-site request forgery. This cookie is essential for the security of the website and visitor.	HTTP	Session
ssr-caching	simplecharge.lv	Necessary	This cookie is necessary for the cache function. A cache is used by the website to optimize the response time between the visitor and the website. The cache is usually stored on the visitor's browser.	HTTP	Session
svSession	simplecharge.lv	Necessary	This cookie is necessary for the login function on the website	HTTP	2 years
XSRF-TOKEN	ecom.wixapps.n et	Necessary	Ensures visitor browsing- security by preventing cross-site request forgery. This cookie is essential for the security of the website and visitor.	НТТР	Session
	ecom.wixapps.n et	Necessary	Ensures visitor browsing- security by preventing cross-site	HTTP	Session

			request forgery. This cookie is essential for the security of the website and visitor.		
XSRF-TOKEN	wix.com	Necessary	Ensures visitor browsing- security by preventing cross-site request forgery. This cookie is essential for the security of the website and visitor.	НТТР	Session
XSRF-TOKEN	simplecharge.lv	Necessary	Ensures visitor browsing- security by preventing cross-site request forgery. This cookie is essential for the security of the website and visitor.	HTTP	Session
firebaseLocalSt orageDb#firebas eLocalStorage	engage.wixapps. net	Preferences	Facilitates the notification function within the chatbox, allow in g the website's support team to notify the user, when a reply has been given in the chat box.	Indexed DB	Persistent
hssc	simplecharge.lv	Statistics	Identifies if the cookie data needs to be updated in the visitor's browser.	HTTP	1 day
hssrc	simplecharge.lv	Statistics	Used to recognise the visitor's browser upon reentry on the website.	HTTP	Session
hstc	simplecharge.lv		Sets a unique ID for the session. This allows the website to obtain data on visitor behavior for statistical purposes	HTTP	180 days
wixAB3	wix.com	Statistics	This cookie is used by the website's operator in context with multivariate testing. This is a tool used to combine or change content on the website. This allows the website to find	HTTP	6 months

			the best variation /edition of the site.		
_wixAB3 #-#-#- #-#	wix.com	Statistics	This cookie is used by the website's operator in context with multivariate testing. This is a tool used to combine or change content on the website. This allows the website to find the best variation /edition of the site.	HTTP	1 day
fedops.logger.de faultOverrides	engage.wixapps. net	Statistics	Registers statistical data on users' behavior on the website. Used for internal analytics by the website operator.	HTTP	1 day
fedops.logger.de faultOverrides	simplecharge.lv	Statistics	Registers statistical data on users' behavior on the website. Used for internal analytics by the website operator.	HTTP	1 day
edops.logger.ses sionId	static.parastorag e.com	Statistics	Registers statistical data on users' behavior on the website. Used for internal analytics by the website operator.	HTML	Persistent
hubspotutk	simplecharge.lv	Statistics	Sets a unique ID for the session. This allows the website to obtain data on visitor behavior for statistical purposes	HTTP	180 days
ptq.gif	hubspot.com	Marketing	Sends data to the marketing platform Hubspot about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.	Pixel	Session
ec	frog.wix.com	Marketing	Registers data on visitors from multiple visits and on multiple websites. This information is	Pixel	Session

	used to measure the efficiency of advertisement on websites.	

13. Third party service providers used by SimpleCharge

13.1. Google Analytics

- 13.1.1. In order to help s better understand its visitors, SimpleCharge uses the services of Google Analytics web analytics platform, which stores a Google Analytics cookie, which, in combination with the code embedded in SimpleCharge Website, collects information about User visits and sends it to Google servers in the European Union. In turn, SimpleCharge accesses and analyzes the obtained statistics and uses it to customize the Website accordingly to create a better user experience for Users. The information collected is anonymised before Google stores it on its servers. The information which can be collected is:
 - 13.1.1.1. Browser type / version,
 - 13.1.1.2. operating system used,
 - 13.1.1.3. Referrer URL (the previously visited page),'
 - 13.1.1.4. Host name of the accessing computer (IP address),
 - 13.1.1.5. Time of the server request.
- 13.1.2. If the User does not wish Google Analytics to process their personal data in question, the User may deny the placement and analysis of such cookies by installing an Google Analytics Opt-out Program on the Users' device.

13.2. HubSpot

- 13.2.1. SimpleCharge uses HubSpot for CRM services and Marketing Automation, such as, sending marketing communications regarding services and events to subscribers. Data subjects may unsubscribe from these communications at any time.
- 13.2.2. HubSpot may collect the following Data subjects information:
 - 13.2.2.1. name, title, company name, job function, expertise, postal address, telephone number, email address. Additionally, personal data may include browser and device information (including IP Address), and information collected through cookies and other similar technologies.

- 13.2.2.2 any information that does not and cannot be used to reveal Data subject'sidentity or that of another individual, such as information which has been fully and permanently anonymized and aggregated. HubSpot uses this information to facilitate operation of the Sites.
- 13.2.3. There are a few things to be aware of in regards to how HubSpot handles tracking cookies:
 - 13.2.3.1. If a visitor deletes his or her cookies, he or she will be considered a new visitor and will be assigned a new cookie. However, HubSpot will automatically deduplicate form submissions coming from the same email address, even if different browser cookies were associated with the submissions.
 - 13.2.3.2. Since cookies are unique to a browser, if two people share a single computer, their submissions will be associated with the same contact record. If multiple test submissions from one browser with different email addresses are submitted, these submissions will overwrite each other on a single contact record in HubSpot due to the common tracking cookie. The best way to test submissions, if they are not wanted to be associated with the same contact, is to test using the private browsing mode of the used web browser.
- 13.2.4. Full details on HubSpot's Privacy Policy can be found here: <u>https://legal.hubspot.com/privacy-policy</u>.

13.3. Wix

- 13.3.1. SimpleCharge website is hosted on the Wix.com platform. Wix.com provides SimpleCharge with the online platform that allows us to sell our products and services to our clients. Data Subject's data may be stored through Wix.com's data storage, databases and the general Wix.com applications.
- 13.3.2. Wix uses cookies and collects Personal data for reasons, such as:
 - 13.3.2.1. To provide a great experience for our visitors and customers.
 - 13.3.2.2. To identify our registered members (users who registered to our site)
 - 13.3.2.3. To monitor and analyze the performance, operation and effectiveness of Wix's platform.
 - 13.3.2.4. To ensure this platform is secure and safe to use.
- 13.3.3. For more information on how Wix.com processes Personal data, visit: <u>https://www.wix.com/about/privacy</u>

14. Links to other sites and social networks

- 14.1. SimpleCharge Website may place links to other websites, including websites of Cooperation partners. SimpleCharge does not control and shall not be held responsible for the content provided by a third-party website or Personal Data collected by a third-party website.
- 14.2. SimpleCharge uses the following third-party service providers and social media networks that may collect Personal data upon visit:
 - 14.2.1. Linkedin;
 - 14.2.2. Facebook.
- 14.3. SimpleCharge informs that when any of the aforementioned websites or any other thirdparty website is visited, a privacy policy of the third-party website holder applies to the processing of Personal data of the Data subject. The Data subject is strongly advised to get acquainted with the policies provided by third parties under the privacy section of the respective website.

15. Other provisions

- 15.1. SimpleCharge constantly develops and improves its operations, rules on internal order and security, thus, the Privacy Policy may be changed or supplemented at any time.
- 15.2. The current version of the Privacy Policy is available to any Data subject electronically at <u>www.simplecharge.lv</u>. Additionally, the current version of the Privacy Policy, as well as the previous versions are available by request at SipleCharge's responsible person for processing Personal data.