

Privacy Notice of Energy Efficiency Hub AG (“EEHub”) (January 2024 Version 1.0)

EEHub’s business objectives, goals, strategies and activities are exclusively directed towards **Business Customers (“B to B”)** and the business market. We can however not exclude that we will be doing business with **Private Customers (“B to C”)**. Despite having a focus on **B to B** private individual through their private needs, interest and requirements may use our web page www.eehub.eu and / or our LinkedIn profile. The search for a job opportunity with **EEHub** or for educational purposes may constitute such private interests.

Type of personal data:

General Data: We process general personal data about you.

Business Data: We process your business and business relevant data.

Source of personal data:

Provided Data: We process personal data that you provide to us from various sources including our web page and LinkedIn page.

Collected Data: We process personal data that we collect about you.

Received Data: We process personal data about you that we receive from third parties.

Location Data: We may process your location data as obtained through statistics from our webpage and LinkedIn page.

Purpose of processing:

Business Execution: We use your personal data to support the execution of our business (products and services) including contractual commitments and for development and improvement purposes.

Product Development: We use your personal data for the development and improvement of products and services.

Marketing: We use your personal data for marketing purposes.

Other Purposes: We use your personal data for other purposes without direct connection with the core products and services.

Special processes:

Profiling: We may analyze certain data concerning your behavior and make assumptions about your interests and preferences if it supports the business, business execution and our business relationship. We do not do profiling in other areas and about you as a person such as ethnic background, religious or political interests and health.

Automated Decision-Making: We may make decisions based on fully automated processing.

Passing on to third parties:

Data Transfers: We transfer your personal data to other companies that work with us to execute our business. Most of these companies are working with us under a non-disclosure agreement (“**NDA**”). Other companies are service providers that offer in general standard services where we work without an NDA.

Place of processing:

Worldwide: We may process your personal data outside of Switzerland and the EEA depending on the location of the businesses and customers we work for.

1. What is this Privacy Notice about?

Energy Efficiency Hub AG (also “we”, “us”, “our”) collects and processes personal data that concern you but also other individuals («**third parties**»). We use the word «**data**» here interchangeably with «**personal data**».

EEHub means the **Energy Efficiency Hub AG** and its subsidiaries and group companies. A list of these subsidiaries and group companies can be found here www.eehub.eu if there exist subsidiaries and group companies.

«**Personal data**» means data relating to identified or identifiable individuals, which means that the relevant data, in combination with additional data, make it possible to draw conclusions about the identity of these individuals. «**Sensitive personal data**» is a subset of personal data that is specially protected under applicable data protection law. This includes, for example, data revealing racial or ethnic origin, health data, religious or philosophical beliefs, biometric data for identification purposes, and information relating to trade union membership. In Section 3, you will find information about the data we process in accordance with this Privacy Notice. «**Processing**» means any operation that is performed on personal data, such as collection, storage, use, alteration, disclosure and erasure.

In this **Privacy Notice**, we describe what we do with your data when you use www.eehub.eu («**website**»), obtain services or products from us, interact with us in relation to a contract or job opportunity communicate with us or otherwise deal with us. When appropriate we will provide a just-in-time notice to cover any additional processing activities not mentioned in this **Privacy Notice**. In addition, we may inform you about the processing of your data separately, for example in consent forms, terms and conditions, additional privacy notices, forms and other notices.

If you disclose data to us or share data with us about other individuals, we assume that you are authorized to do so and that the relevant data is accurate. When you share data about others with us, you confirm that. Please make sure that these individuals have been informed about this Privacy Notice.

This Privacy Notice is aligned with the **EU General Data Protection Regulation («GDPR»)**, the Swiss Data Protection Act («**DPA**») and the revised **Swiss Data Protection («revDPA»)**. However, the application of these laws depends on each individual case.

2. Who is the controller for processing your data?

Energy Efficiency Hub AG, Bundesstrasse 5, 6300 Zug, Switzerland («**EEHub**») is the controller processing under this **Privacy Notice**, unless we tell you otherwise in an individual case, for example in additional privacy notices, on a form or in a contract. However, unless we tell you otherwise, this **Privacy Notice** also applies where a group company of **EEHub** is the controller, instead of **EEHub**. This applies, in particular, where your data is processed by a group company in connection with its own legal obligations or contracts or where you share data with such a group company. In these cases, this group company is the controller and only if it shares your data with other group companies for their own processing (see **Section 7**), will these other group companies also become controllers.

For each processing activity there are one or several parties that are responsible for ensuring that the processing complies with data protection law. This party is called the **controller**. It is responsible, for example, for responding

to access requests (**Section 11**) or for ensuring that personal data is processed securely and not used in an unlawful manner.

Additional parties may be **joint controllers** for the processing set out in this **Privacy Notice** if they participate in determining the purpose or means of the processing. All group companies may act as joint controllers. If you wish to receive information about the controllers for a specific processing activity, you are welcome to ask us as part of your access rights (**Section 11**). **EEHub** remains your primary contact, even if there are other joint controllers.

In **Section 3**, **Section 7** and **Section 12**, you will find additional information about **third parties with whom we work together if there are third parties**. If you have any questions for these third parties or if you wish to exercise your rights, please contact them directly.

Third parties with whom we may share your data or who may be joint controllers for the processing of your data can be found here: www.hostpoint.ch/.

You may contact us for data protection concerns and to exercise your rights under **Section 11** as follows:

Energy Efficiency Hub AG, Bundesstrasse 5, CH-6300 Zug, Switzerland

E-mail: dataprotection@eehub.eu

3. What data do we process?

Technical data: When you use our website or other online offerings, we collect the IP address of your terminal device and other technical data in order to ensure the functionality and security of these offerings. This data includes logs with records of the use of our systems. We generally keep technical data for twenty four (24) months. In order to ensure the functionality of these offerings, we may also assign an individual code to you or your terminal device (for example as a cookie, see **Section 12**). Technical data as such does not permit us to draw conclusions about your identity. However, technical data may be linked with other categories of data (and potentially with your person) in relation to user accounts, registrations, access controls or the performance of a contract.

Technical data includes the IP address and information about the operating system of your terminal device, the date, region and time of use and the type of browser that you use to access our electronic offerings. This can help us to provide an appropriate layout of the website or to show you a website customized for your region, for example. We know through which provider you access our offerings (and therefore also the region) because of the IP address, but usually this does not tell us who you are. However, this changes for example when you create a user account, because personal data can then be linked with technical data (for example, we can know the browser you use to access an account through our website). Examples of technical data include protocols («logs») that are created in our systems (for example the log of user logins to our website).

Registration data: Certain offerings, services (such as login areas of our website, newsletters etc.) can only be used with a user account or registration, which can happen directly with us or through our third-party login service providers. In this regard you must provide us with certain data, and we collect data about the use of the offering or service.

Registration data includes the information you provide when you create an account on our website (for example username, password, name, e-mail). It also includes the data that we may require from you before you can use certain free services.

Communication data: When you are in contact with us via a contact form, by e-mail, telephone or chat, or by letter or other means of communication, we collect the data exchanged between you and us, including your contact details and the metadata of the communication. If we record or listen in on telephone

conversations or video conferences, for example for training and quality assurance purposes, we will tell you specifically. Such recordings may only be made and used in accordance with our internal policies. You will be informed if and when such recordings take place, for example by an indication during the video conference in question. If you do not want to be recorded, please notify us or leave the (video) conference. If you simply do not want your image to be recorded, please turn off your camera. If we have to determine your identity, for example in relation to a request for information, a request for press access, etc., we collect data to identify you (for example a copy of an ID document). We generally keep this data for twenty four (24) months from the last exchange between us. This period may be longer where required for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons. E-mails in personal mailboxes and written correspondence are generally kept for at least ten (10) years. Recordings of (video) conferences we will usually keep for five (5) years. Chats are generally stored for five (5) years. This in particular if they are relevant to services and work we are doing for our customers and maybe stored even longer if so required.

Communication data is your name and contact details, the means, place and time of communication and usually also its content (i.e. the content of e-mails, letters, chats, etc.). This data may also include information about third parties. For identification purposes, we may also process your ID document number or a password set by you or your press pass. For secure identification, the following required information must be provided for media inquiries: Publisher, name of publication, title, first name, surname, postal address, e-mail address and telephone number of the reporter.

Master data: With master data we mean the basic data that we need, in addition to contract data (see below), for the performance of our contractual and other business relationships or for marketing and promotional purposes, such as name and contact details, and information about, for example, your role and function, your bank details, your date of birth, customer history, powers of attorney, signature authorizations and declarations of consent. We process your master data if you are a customer or other business contact or work for one (for example as a contact person of the business partner) or because we wish to address you for our own purposes or for the purposes of a contractual partner (for example as part of marketing, with invitations to events, with newsletters, etc.). We receive master data from you, from parties you work for or from third parties such as contractual partners, associations and address brokers, and from public sources such as public registers or the internet (websites, social media, etc.). We may also collect master data from our shareholders and investors. We generally keep master data for ten (10) years from the last exchange between us or from the end of the contract. This period may be longer if required for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons.

Master data includes data such as name, address, e-mail address, telephone number and other contact details, gender, date of birth, nationality, websites, social media profiles, photos and videos, copies of ID cards; moreover, details of your relationship with us (customer, supplier, visitor, service recipient, etc.), details of your status, allocations, classifications and mailing lists, details of our **interactions** with you (if applicable, a history thereof with corresponding entries), reports (for example from the media), or official documents (for example excerpts from the commercial register, permits, etc.) that concern you. As **payment information**, we collect, for example, your bank details, account number and credit card data. Declarations of consent and opt-out information are also part of the master data, as well as information about third parties, for example contact persons, recipients of services, marketing recipients or representatives.

In relation to contact persons and representatives of our **customers, suppliers and partners**, master data includes, for example, name and address, information about the role or function in the company, qualifications and (where applicable) information about superiors, co-workers and subordinates and information about interactions with these persons.

Master data is not collected comprehensively for all contacts. The data collected in an individual case depends mostly on the purpose of the processing activity.

Contract data: This means data that is collected in relation to the conclusion or performance of a contract, for example information about the contracts and the services provided or to be provided, as well as data from the period leading up to the conclusion of a contract, information required or used for performing a contract, and information about feedback. We generally collect this data from you, from contractual partners and from third parties involved in the performance of the contract, but also from third-party sources (for example credit information providers) and from public sources. We generally keep this data for ten (10) years from the last contract activity or from the end of the contract. This period may be longer where necessary for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons.

Contract data includes information about the **conclusion of the contract**, about your **contracts**, for example, the type and date of conclusion, information from the application process (such as the application for the performance of our products or services) and information about the relevant contract (for example its duration) and the performance and administration of the contracts (for example information related to billing, customer service, technical assistance and enforcement of contractual claims). Contract data also includes information about deficiencies, complaints and changes to a contract, as well as information about customer satisfaction that we may collect, for example, through surveys. Contract data also includes **financial data**, such as credit information (meaning information that allows us to draw conclusions about the likelihood that receivables will be paid), information about reminders and debt collection. We receive this data partly from you (for example when you make payments), but also from credit agencies and debt collection companies and from public sources (for example a commercial register).

Behavioral and preference data: Depending on our relationship with you, we collect and process data about your behavior and preferences. We do so by evaluating information about your behavior in our domain and we may also supplement this information with third-party information, including from public sources. Based on this data, we can for example determine the likelihood that you will use certain services. The data processed for this purpose is already known to us (for example where and when you use our services), or we collect it by recording your behavior (for example how you navigate our website). We anonymize or delete this data when it is no longer relevant for the purposes pursued, which may be – depending on the nature of the data – between two (2) weeks and twenty four (24) months (for product and service preferences). This period may be longer where necessary for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons. We describe how tracking works on our website in **Section 12**.

Behavioral data is information about certain actions, such as your response to electronic communications (for example if and when you have opened an e-mail) or your location, as well as your interaction with our social media pages and your participation in events. For example, we may collect your location data when you use our website. We will tell you about the collection of anonymous motion profiles, and we will only create personalized motion profiles with your consent.

Preference data tells us what your needs are, which products or services might be of interest to you. We obtain this information from the analysis of existing data, so that we can get to know you better, tailor our advice and offers more precisely to you and generally improve our offers. To improve the quality of our analyses, we may combine this data with other data that we also obtain from third parties, such as address dealers, administrative offices and publicly available sources such as the Internet and anonymous information from statistical offices.

Preference data may be analyzed on a **personally identifiable basis**, but also on a **non-identifiable basis** (for example for market research or product and service development). Preference data may also be combined with other data.

Other data: We also collect data from you in other situations. For example, data that may relate to you (such as files, evidence, etc.) is processed in relation to administrative or judicial proceedings. We may obtain or create photos, videos and sound recordings in which you may be identifiable (for example at events, with security cameras, etc.). We may also collect data about who enters certain buildings, and

when or who has access rights (including in relation to access controls, based on registration data or lists of visitors, etc.), who participates in events or campaigns and who uses our infrastructure and systems and when. Moreover, we collect and process data about our shareholders and other investors, in addition to master data, including information for registers, in relation to the exercise of their rights and events (for example general meetings). The retention period for this data depends on the processing purpose and is limited to what is necessary. Data relating to you as a shareholder or investor is kept in accordance with corporate law, but in any case for as long as you are invested.

Much of the data set out in this **Section 3** is provided to us by you (through forms, when you communicate with us, in relation to contracts, when you use the website, etc.). You are not obliged or required to disclose data to us except in certain cases, for example due to legal obligations. If you wish to enter into contracts with us or use our services, you must also provide us with certain data, in particular master data, contract data and registration data, as part of your contractual obligation under the relevant contract. When using our website, the processing of technical data cannot be avoided. If you wish to gain access to certain systems or buildings, you must also provide us with registration data. However, in the case of behavioral and preference data, you generally have the option of objecting or not giving consent.

We provide certain services to you only if you provide us with **registration data**, because we or our contractual partners wish to know who uses our services or has accepted an invitation to an event, because it is a technical requirement or because we wish to communicate with you. If you or the person you represent (for example your employer) wishes to enter into or perform a contract with us, we must collect **master data, contract data and communication data** from you and we process **technical data** if you wish to use our website or other electronic offerings for this purpose. If you do not provide us with the data necessary for the conclusion and performance of the contract, you should expect that we may refuse to conclude the contract, that you may commit a breach of contract or that we will not perform the contract. Similarly, we can only submit a response to a request from you if we process **communication data** and – if you communicate with us online – possibly also **technical data**. Also, the use of our website is not possible without us receiving **technical data**.

As far as it is not unlawful we also collect data from public sources (for example debt collection registers, land registers, commercial registers, the media, or the internet including social media) or receive data from other companies within our group, from public authorities and from other third parties (such as credit agencies, address brokers, associations, contractual partners, internet analytics services, etc.).

The categories of personal data that we **receive about you from third parties** include, in particular, information from public registers, information that we receive in relation to administrative and legal proceedings, information in relation to your professional functions and activities (so that we can, for example, conclude and process transactions with your employer with your assistance), information about you in correspondence and meetings with third parties, credit information (where we conduct business with you in a personal capacity), information about you that persons related to you (advisors, legal representatives, etc.) share with us so that we can conclude or perform contracts with you or involving you (for example references, your delivery address, powers of attorney, information about compliance with legal requirements such as those relating to fraud prevention and the combating of money laundering and terrorist financing, export restrictions, information from banks, insurance companies, sales and other contractual partners of us about your use or provision of services (for example payments, purchases, etc.), information from the media and the internet about the use or provision of services by you (for example payments made, purchases made, etc.), information from the media and the internet about you (where appropriate in a specific case, for example in the context of an application, marketing/sales, press review, etc.), your address and potentially interests and other socio-demographic data (especially for marketing and research purposes) and data in relation to the use of third-party websites and online offerings where such use can be linked to you.

4. For what purposes do we process your data?

We process your data for the purposes explained below. Further information is set out in **Sections 12** and **Section 13** for online services. These purposes and their objectives represent interests of us and potentially of third parties. You can find further information on the legal basis of our processing in **Section 5**.

We process your data for purposes related to communication with you, in particular in relation to responding to inquiries and the exercise of your rights (**Section 11**) and to enable us to contact you in case of queries. For this purpose, we use in particular communication data and master data, and registration data in relation to offers and services that you use. We keep this data to document our communication with you, for training purposes, for quality assurance and for follow-up inquiries.

The above includes all purposes in relation to which we communicate with you, whether in the context of customer service or consulting, authentication in case the website is used, and for training and quality assurance (for example in customer service). We further process communication data to enable us to communicate with you by e-mail and telephone, as well as through messenger services, chats, social media and by letter. Communication with you usually takes place in relation to other processing purposes, for example so that we can provide services or respond to an access request. Our processing also serves to document the communication and its content.

We process data for the conclusion, administration and performance of contractual relationships.

We conclude various contracts with our business customers, suppliers, subcontractors and other parties, such as partners in projects or parties in legal proceedings. In particular, we process master data, contract data and communication data and, depending on the circumstances, registration data relating to the customer or the persons for whose benefit the customer has received a service. This includes, for example, the recipients of our products or services. In this case, we process data in order to perform the contract with these recipients, but also with the contractual partners who are involved.

In the run-up of a business relationship, personal data – in particular master data, contract data and communication data – is collected from potential customers or other contractual partners (for example in an order form or a contract) or results from a communication. In connection with the conclusion of a contract, we process data to assess creditworthiness and to start a customer relationship. In some cases, this information is reviewed in order to comply with legal requirements.

As part of performing contractual relationships, we process data for the administration of the customer relationship, to provide and claim contractual services (which includes involving third parties, such as logistics companies, security service providers, service providers, banks, insurance companies or credit information providers, who may in turn provide data to us), for consulting and for customer support. The enforcement of legal claims arising from contracts (debt collection, legal proceedings, etc.) is also part of the performance, as are accounting, termination of contracts and public communication.

We process data for marketing purposes and relationship management, for example to send our customers and other contractual partners advertising for products and services from us and from potential third parties. This may happen in the form of newsletters and other regular contacts (electronically, by e-mail or by telephone), through other channels for which we have contact information from you, but also as part of marketing campaigns (for example events, trainings etc.) and may also include free services (for example invitations to events as long as this is permitted by your employers' policies). You can object to such contacts at any time (see at the end of this **Section 4**) or refuse or withdraw consent to be contacted for marketing purposes. With your consent, we can target our online advertising on the internet more to your needs, interest and requirements (see **Section 12**). Finally, we may wish to enable our contractual partners to contact our customers and other contractual partners for marketing purposes (see **Section 7**).

For example, if you consent we may send you information, advertising and product offers from us and from third parties within and outside the group, as printed material, electronically or by telephone. For this purpose, we

process in particular communication and registration data. As most companies, we personalize communications so that we can provide you with customized information and offers that meet your needs, interests and requirements. Therefore, we combine data we process about you and may collect certain preference data and use this data as a basis for personalization (see **Section 3**).

Relationship management includes addressing existing customers and their contacts, possibly personalized on the basis of behavioral and preference data. In the context of relationship management, we may also operate a customer relationship management system («**CRM**») in which we keep the data of customers, suppliers and other business partners that is required for relationship management, for example data about contact persons, relationship history (for example information about products and services purchased or supplied, interactions, etc.), interests, marketing measures (newsletters, invitations to events, etc.) and other information.

All this processing is important to us not only to promote our offerings as effectively as possible, but also to make our relationships with customers and other third parties more personal and positive, to focus on the most important relationships, and to use our resources as efficiently as possible.

We further process your data for market research, to improve our services and operations, and for product and service development.

We strive to continuously improve our products and services (including our website) and to respond quickly to changing needs. We therefore analyze, for example, how you navigate through our website or which products and services are used by our existing and potential future customers and in which way and how new products and services can be designed (for further details, see **Section Fehler! Verweisquelle konnte nicht gefunden werden.**). This helps us understand the market acceptance of existing products and services and the market potential of new products and services. To this end, we process in particular master data, certain behavioral data and preference data, but also communication data and information from customer surveys, polls and studies and other information, for example from the media, social media, the Internet and other public sources. We may use pseudonymized or anonymized data for these purposes to the extent possible. We may also use media monitoring services or conduct media monitoring ourselves and process personal data in order to conduct media monitoring or to understand and respond to current developments and trends.

We may also process your data for security and access control purposes.

We continuously review and improve the appropriate security of our IT and other infrastructure (for example buildings). Like all companies, we cannot exclude data security breaches with absolute certainty, but we do our best to reduce the risks. We therefore process data, for example, for monitoring, inspection, analysis and testing of our networks and IT infrastructures, for system and error checks, for documentation purposes and in the context of backups. Access controls include electronic system access controls (for example logging into user accounts), as well as physical access controls (for example building access). For security purposes (to prevent and investigate incidents), we also keep access protocols and visitor lists and use surveillance systems (for example security cameras). We will inform you about surveillance systems at the relevant locations through appropriate information and visualization.

We process personal data to comply with laws, directives and recommendations from authorities and internal regulations («**Compliance**»).

This includes, for example, the implementation of security concepts or the regulated fight against money laundering and terrorist financing. In certain cases, we may also be required to make certain clarifications about our customers («**Know Your Customer**») or to report to the authorities. Disclosure and information or reporting obligations, for example in connection with supervisory and tax obligations, also require or entail data processing, for example archiving obligations and the prevention, detection and investigation of criminal offenses and other violations. This also includes receiving and processing complaints and other reports, monitoring communications, conducting internal investigations or disclosing documents to an authority if we have sufficient reasons to do so or are legally obliged to do so. We may also process your personal data in relation to external investigations, for example by a law enforcement or supervisory authority or by a mandated private entity. Furthermore, we process data in order to serve our shareholders and other investors and to fulfill our obligations in this regard. For all these purposes, we process in particular master data, contract data and communication data, but also, under

certain circumstances, behavioral data and data from the category of «other data». The legal obligations may arise under Swiss law but also under foreign regulations to which we are subject, as well as self-regulations, industry standards, our own «**corporate governance**» and instructions and requests from authorities.

We also process data for the purposes of our risk management and as part of our corporate governance, including business organization and development.

For these purposes, we process in particular master data, contract data, registration data and technical data and possibly certain behavioral and communication data. For example, as part of our financial management, we need to monitor our accounts receivable and accounts payable and we need to avoid becoming victims of crime and abuse, which may require us to analyze data for relevant patterns of such activities. We may process certain personal data for these purposes and to protect you and us from criminal or abusive activity (see also **Section Fehler! Verweisquelle konnte nicht gefunden werden.**). In the context of planning our resources and organizing our operations, we may need to evaluate and process data relating to the use of our services and other offerings or share information about them with others (for example outsourcing partners), which may also include your data. The same applies with respect to services provided to us by third parties. As part of our business development, we may sell businesses, parts of businesses or companies to others or acquire them from others or enter into partnerships, which may also result in the exchange and processing of data (including from you, for example as a customer or supplier or as a supplier representative).

We may process your data for further purposes, for example as part of our internal processes and administration or for quality assurance purposes and trainings.

These further purposes include, for example, training and educational purposes, administrative purposes (such as managing master data, accounting and data archiving, and testing, managing and continuously improving IT infrastructure), protecting our rights (for example to enforce claims in or out of court, and before authorities in Switzerland and abroad, or to defend ourselves against claims, for example by preserving evidence, conducting legal assessments and participating in court or administrative proceedings) and evaluating and improving internal processes. We may use recordings of (video) conferences for quality assurance purposes and trainings. These further purposes also include safeguarding other legitimate interests but not limited too.

5. On what basis do we process your data?

Where we ask for your consent for certain processing activities for example for the processing of personal data, for marketing mailings and behavior analysis on the website, we will inform you separately about the relevant processing purposes. You may withdraw your consent at any time with effect for the future by providing us written notice by mail or, unless otherwise noted or agreed, by sending an e-mail to us; see our contact details in **Section 2**. For withdrawing consent for online tracking, see **Section 12**. Where you have a user account, you may also withdraw consent or contact us also through the relevant website or other service, as applicable. Once we have received notification of withdrawal of consent, we will no longer process your information for the purpose(s) you consented to, unless we have another legal basis to do so. Withdrawal of consent does not, however, affect the lawfulness of the processing based on the consent prior to withdrawal.

Where we do not ask for consent for processing, the processing of your personal data relies on the requirement of the processing for initiating or performing a contract with you (or the entity you represent) or on our or a third-party legitimate interest in the particular processing, in particular in pursuing the purposes and objectives set out in **Section 4** and in implementing related measures. Our legitimate interests also include compliance with legal regulations, insofar as this is not already recognized as a legal basis by applicable data protection law (for example in the case of the GDPR, the laws in the European Economic Area (EEA) and in the case of the DPA, Swiss law). This also includes the marketing of our products and services, the interest in better understanding our markets and in managing and further developing our company, including its operations, safely and efficiently.

We do not process sensitive personal data (for example health data, data about political opinions, religious or philosophical beliefs, and biometric data for identification purposes apart from certain personal data related to employment including pension, health insurance etc. which is mandated and required as an employer).

6. What applies in case of profiling and automated individual decisions?

We may automatically evaluate personal aspects relating to you («profiling») based on your data (**Section 3**) for the purposes set out in **Section 4**, where we wish to determine preference data, but also in order to detect misuse and security risks, to perform statistical analysis or for operational planning. We may also create profiles for these purposes, i.e. we may combine certain behavioral and preference data, but also master data, contract data and technical data relating to you in order to better understand you as a person with your various needs, interests and requirements.

If you are our customer, we may, for example, use «profiling» to determine which other products and services are likely to be of interest to you based on your purchases. We may also use profiling to assess your creditworthiness before offering you to pay for a purchase by invoice. An automated data analysis may also determine, for your own protection, the likelihood of a particular transaction being fraudulent. This allows us to suspend the transaction for further clarification. «Profiles» are to be distinguished from «profiling». «Profiles» refers to the combining of different data in order to draw conclusions on essential aspects of your personality (for example what you like, how you behave in certain situations) from the totality of this data. Profiles may also be used for marketing, for example, or for security purposes.

In both cases, we pay attention to the proportionality and reliability of the results and take measures against misuse of these profiles or profiling. Where these can produce legal effects concerning you or similarly significantly affect you, we generally ensure human review.

In certain situations, it may be necessary for the efficiency and consistency of decision-making processes that we automate discretionary decisions that produce legal effects concerning you or similarly significantly affect you («**automated individual decisions**»). In these cases, we will inform you accordingly and take the measures required by applicable law.

Simple if-then decisions are not included (for example where a computer lets you access your user account after successfully checking your password). Only discretionary decisions (for example the decision to enter into a contract) could be an example for an automated individual decision. We will inform you in each case where an automated decision produces negative legal effects concerning you or similarly significantly affects you. If you do not agree with the result of such a decision, you will be able to communicate about it with a human being who will review the decision.

7. With whom do we share your data?

In relation to our contracts, the website, our services and products, our legal obligations or otherwise with protecting our legitimate interests and the other purposes set out in Section 4, we may disclose your personal data to third parties, in particular to the following categories of recipients:

Group companies: A list of our group companies can be found here www.eehub.eu if they exist. These group companies may use the data according to this **Privacy Notice** for the same purposes as we use it (see **Section 4**).

The group companies have access in particular to your master data, contract data and registration data, as well as certain behavioral and preference data in order to offer their own range of products and services to you or to market them. If you wish to object to the disclosure and use of data for marketing purposes, you can do so through us (**Section Fehler! Verweisquelle konnte nicht gefunden werden.**), even if the processing concerns another group

company once data has already been transferred. We also disclose your data to other group companies for certain products and services, for example if certain products and services originate from other group companies where we only coordinate the performance.

Service providers: We work with service providers in Switzerland and abroad who process your data on our behalf or as joint controllers with us or who receive data about you from us as separate controllers for example our business partners, IT providers, shipping companies, marketing service providers, login service providers, security companies, banks, insurance companies, debt collection companies, credit information agencies, or address verification providers but not limited to.

To be able to deliver our products and services efficiently and focus on our core competencies, we procure services from third parties in various areas. These include, for example, IT services, information transmission, marketing, sales, technical, communication or printing services, facility management, security and cleaning, organizing and holding events and receptions, debt collection, credit agencies, address verification provider (for example to update address lists in case of relocations), fraud prevention measures and services from consulting companies, lawyers, banks, insurers and telecommunication companies. In each case, we disclose to these providers the data they require for their services, which may also concern you. These providers may also use such data for their own purposes, for example information about overdue claims and your payment history in case of credit information agencies or anonymized data to improve their services. In addition, we enter into contracts with these providers that include provisions to protect data, where such protection does not follow from the law. In some cases, our service providers may also process data on how their services are used and other data that is generated in the course of using their services as independent data controllers for their own legitimate interests (e.g., for statistical analysis or billing purposes). Service providers inform about their independent data processing activities in their own privacy statements.

Contractual partners including customers: This refers to customers for example service recipients and our other contractual partners as this data disclosure results from these contracts. If you work for one of these contractual partners, we may also disclose data about you to that partner in this regard. These recipients also include contractual partners with whom we cooperate or who carry out various services for us and to whom we may therefore disclose data about you for analysis and marketing purposes but not limited too. The list of our cooperation partners is not public as they and we are compelled by non-disclosure agreements (“**NDA**”).

If you act as an employee for a company with which we have concluded a contract, performance of this contract may require us to tell the company, for example, how you have used our service. Cooperation partners and marketing partners receive selected master data, contract data, certain behavioral data and preference data from us so that they can carry out non-personal analyses in their fields and, on the other hand, so that they can use data for the objective of performing services related to **EEHub** and **Customers**.

Authorities: We may disclose personal data to agencies, courts and other authorities in Switzerland and abroad if we are legally obliged or entitled to make such disclosures or if it appears necessary to protect our interests.

Examples are criminal investigations, police measures, regulatory requirements and investigations, legal proceedings, reporting obligations and pre-court and out-of-court proceedings, as well as legal obligations to provide information and to cooperate. Data may also be disclosed if we wish to obtain information from public bodies, for example in order to justify a request for information or because we need to say about whom we require information (for example from a register).

Other persons: This means other cases where interactions with third parties follows from the purposes set out in **Section 4**, for example service recipients, the media and associations in which we participate or if you are included in one of our publications.

Other recipients include, for example, delivery recipients or third-party payees specified by you, other third parties in relation to agency relationships (for example if we share your data with your lawyer or your bank) or persons involved in administrative or legal proceedings. If we cooperate with the media and share materials with them (for example photos), this may also affect you depending on the circumstances. The same applies if we publish content (for example photos, interviews, quotes, etc.), for example on our website or in our other publications. As part of our business development, we may sell businesses, parts of businesses or companies to others or acquire them from others or enter into partnerships, which may also result in the disclosure of data (including from you, for example as a customer or supplier or as a supplier representative) to those persons involved in these transactions. In relation to communicating with industry related companies and service providers, industry organizations, associations and other bodies, data may be exchanged that also affects you.

All these categories of recipients may involve third parties, so that your data may also be disclosed to them. We can restrict the processing by certain third parties (for example IT providers), but not by others (for example authorities, banks, etc.).

We reserve the right to make such disclosures of data under non-disclosure agreements if we are required to do so by law. Notwithstanding the foregoing, your data will continue to be subject to adequate data protection in Switzerland and the rest of Europe, even after disclosure. For disclosure to other countries, the provisions of **Section 8** apply. If you do not wish certain data to be disclosed, please let us know so that we can review if and to what extent we can accommodate your concern (**Section 2**).

In many cases, the disclosure of data under non-disclosure agreements is necessary in order to perform contracts or provide other services. In general non-disclosure agreements do not exclude such disclosures of data nor disclosures to service providers. However, depending on the sensitivity of the data and on other circumstances, we ensure that these third parties handle the data appropriately. We cannot comply with your objection to the disclosure of data where the disclosure in question is necessary for our activities.

In addition, we enable certain third parties to collect personal data from you on our web-site and at events organized by us (for example press photographers, providers of tools on our website, etc.). Where we have no control over these data collections, these third parties are sole controllers. If you have concerns or wish to exercise your data protection rights, please contact these third parties directly e.g. Hostpoint AG <https://www.hostpoint.ch/>.

8. Is your personal data disclosed abroad?

As explained in **Section 7**, we disclose data to other parties. These are not all located in Switzerland. Your data may therefore be processed both in Europe and rest of the world in particular related to the performance of a contract that requires disclosure, if you have consented or if data has been made available generally by you and you have not objected against the processing. In general all contract work will be performed under non-disclosure agreements, but there may be exceptions.

Many countries outside of Switzerland or the EEA currently do not have laws that ensure an adequate level of data protection under the DPA or the GDPR. The contractual arrangements mentioned compensate for this weaker or missing legal protection to some extent. However, contractual precautions cannot eliminate all risks. You should be aware of these remaining risks, even though they may be low in an individual case, and we do our best to minimize them.

Please note that data exchanged via the internet is often routed through third countries. Your data may therefore be sent abroad even if the sender and recipient are in the same country. We may also use data centers for data processing and storage outside Switzerland and EEA. We may not always know which data center is being used and its location when we work with large supplier of data processing and data storage services.

9. How long do we process your data?

We process your data for as long as our processing purposes, the legal retention periods and our legitimate interests in documentation and keeping evidence require it or storage is a technical requirement and or a contractual requirement. You will find further information on the respective storage and processing periods for the individual data categories in **Section 3**, and for cookies in **Section 12**. If there are no contrary legal or contractual obligations, we will delete or anonymize your data once the storage or processing period has expired as part of our usual processes.

Documentation and evidence purposes include our interest in documenting processes, interactions and other facts in view of legal claims, inconsistencies, IT and infrastructure security requirements and demonstrating good corporate governance and compliance. Retention may be a technical requirement if certain data cannot be separated from other data and we therefore need to keep it with them (for example in case of backups or document management systems).

10. How do we protect your data?

We take appropriate security measures in order to maintain the required security of your personal data and ensure its confidentiality, integrity and availability and to protect it against unauthorized or unlawful processing and to mitigate the risk of loss, accidental alteration, unauthorized disclosure or access.

Technical and organizational security measures may include logging, access restrictions, keeping backup copies, giving instructions to our employees, entering confidentiality agreements and monitoring and select adequate service providers for e-mail, web and for intrusion software. However, we can only secure areas in our control. We also require our data processors to take appropriate security measures. However, security risks can never be excluded completely; residual risks are unavoidable.

11. What are your rights?

Applicable data protection laws grant you the right to object to the processing of your data in some circumstances, in particular for direct marketing purposes, for profiling carried out for direct marketing purposes and for other legitimate interests in processing.

To help you control the processing of your personal data, you have the following rights in relation to our data processing, depending on the applicable data protection law:

- ✓ The right to request information from us as to whether and what data we process from you;
- ✓ The right to have us correct data if it is inaccurate;
- ✓ The right to request erasure of data;
- ✓ The right to request that we provide certain personal data in a commonly used electronic format or transfer it to another controller;
- ✓ The right to withdraw consent, where our processing is based on your consent;
- ✓ The right to receive, upon request, further information that is helpful for the exercise of these rights;
- ✓ The right to express your point of view in case of automated individual decisions (**Section 6**) and to request that the decision be reviewed by a human.

If you wish to exercise the above-mentioned rights in relation to us (or with one of our group companies if existing), please contact us in writing, at our premises or, unless otherwise specified or agreed, by e-mail; you will find our contact details in **Section 2**. In order for us to be able to prevent misuse, we need to identify you (for example by means of a copy of your ID card, unless identification is not possible otherwise).

You also have these rights in relation to other parties that cooperate with us as separate controllers – please contact them directly if you wish to exercise your rights in relation to their processing. You can request contact information about key partners and service providers by contacting us via e-mail, you will find our contact details in **Section 2**.

Please note that conditions, exceptions or restrictions apply to these rights under applicable data protection laws (for example to protect third parties or trade secrets). We will inform you accordingly where applicable upon written request.

In particular, we may need to continue to process and keep your personal data in order to perform a contract with you, to protect our own legitimate interests, such as the assertion, exercise or defense of legal claims, or to comply with legal obligations. To the extent legally permitted, in particular to protect the rights and freedoms of other data subjects and to safeguard legitimate interests, we may also reject a subject request in whole or in part (for example by redacting content that concerns third parties or our trade secrets).

If you do not agree with the way we handle your rights or with our data protection practices, please let us know, pls see **Section 2**. If you are located in the EEA, the United Kingdom or in Switzerland, you also have the right to lodge a complaint with the competent data protection supervisory authority in your country. You can find a list of authorities in the EEA here: https://edpb.europa.eu/about-edpb/board/members_en. You can reach the UK supervisory authority here: <https://ico.org.uk/global/contact-us/>. You can reach the Swiss supervisory authority here: <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>.

12. Do we use online tracking and online advertising techniques?

We use various techniques on our website that allow us and third parties engaged by us to recognize you during your use of our website, and possibly to track you across several visits. This Section informs you about this.

In essence, we wish to distinguish access by you (through your system) from access by other users, so that we can ensure the functionality of the website and carry out analysis and personalization. We do not intend to determine your identity, even if that is possible where we or third parties engaged by us can identify you by combination with registration data. However, even without registration data, the technologies we use are designed in such a way that you are recognized as an individual visitor each time you access the web-site, for example by our server (or third-party servers) that assign a specific identification number to you or your browser (so-called «**cookie**»).

Cookies are tiny files or individual codes (for example a serial number) that our server or a server of our service providers or marketing partners transmits to your system when you connect to our website, and that your system (browser, cell phone) accepts and stores until the set expiration time. Your system transmits these codes to our server or the third-party server with each additional access. That way, you are recognized even if your identity is unknown.

Other technologies may be used to recognize you with some likelihood (i.e. distinguish you from other users), such as «**fingerprinting**». Fingerprinting combines your IP address, the browser you use, screen resolution, language settings and other information that your system tells each server), resulting in a more or less unique fingerprint. This makes it possible to go without cookies.

Whenever you access a server (for example when you use a website or an app, or because an e-mail includes a visible or invisible image), your visits can therefore be «**tracked**». If we integrate offers from a marketing partner or a provider of an analysis tool on our website, they may track you in the same way, even if you cannot be identified in a particular case.

We use these technologies on our website and may allow certain third parties to do so as well. However, depending on the purpose of these technologies, we may ask for consent before they are used. You can also set your browser to block or deceive certain types of cookies or alternative technologies, or to delete

existing cookies. You can also add software to your browser that blocks certain third-party tracking. You can find more information on the help pages of your browser (usually with the keyword «**Help** or **Privacy**»).

What Are Cookies: As is common practice with almost all professional websites to uses cookies, which are tiny files or codes that are downloaded to your computer, to improve your experience. This **Privacy Notice** describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or ‘break’ certain elements of the site’s functionality. For more general information on cookies see the Wikipedia article on HTTP Cookies.

How We Use Cookies: We use cookies for a variety of reasons detailed below. Unfortunately in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

Disabling Cookies: You can prevent the setting of cookies by adjusting the settings on your browser (see your browser **Help** or **Privacy** for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of the site. Therefore it is recommended that you do not disable cookies.

We use cookies to record and analyze the use of our website and use third-party analytics services for this purpose. Through Hostpoint AG (our web hosting service <https://www.hostpoint.ch/>) and their metrics supplier <https://www.logaholic.com/> we may obtain the following metrics:

Key metrics:

- ✓ Total Visits
- ✓ Visits Trends
- ✓ Total Pageviews
- ✓ Conversion Rate
- ✓ New Vs Returning
- ✓ Pages per User
- ✓ Site Errors
- ✓ Bounce Rate

Visitor Trends:

- ✓ Visitors per Day
- ✓ Visitors per Month
- ✓ Trend Analysis
- ✓ New Vs Returning
- ✓ Top Hours
- ✓ Top Days
- ✓ Visit Duration Per Day
- ✓ Total Duration Per Day
- ✓ Compare Days
- ✓ Visitor Details:

- ✓ Visit Duration
- ✓ Most Active Users
- ✓ Recent Visitors
- ✓ Surveys
- ✓ Total Duration
- ✓ Authenticated Visitors

Popular Content:

- ✓ Top Pages
- ✓ Page Trends
- ✓ Landing Page
- ✓ Most Crawled Pages
- ✓ KPI: unlimited
- ✓ Immediately update statistics
- ✓ Customizable Dashboard
- ✓ PDF Export
- ✓ Top Pages - Details
- ✓ Top Entry Pages
- ✓ Top Feeds
- ✓ Average Page Time
- ✓ Top Pages in the Last Hour

Navigation:

- ✓ Top Click Paths
- ✓ Page Analysis
- ✓ Click Trails
- ✓ Internal Site Search
- ✓ Top Exit Pages
- ✓ Exit Clicks

Traffic Sources:

- ✓ Top Referrers
- ✓ Referrer Trends
- ✓ Top Keywords
- ✓ Keyword Trends
- ✓ Search Engines
- ✓ Search Engines Trends
- ✓ Google Rankings
- ✓ Traffic Breakdown

- ✓ Top Referrers - Details
- ✓ Top Keywords - Details
- ✓ Social Media
- ✓ Detailed Search Engines
- ✓ Social Media Trends

Locations:

- ✓ Top Continents
- ✓ Top Countries / Cities
- ✓ Top Cities
- ✓ Country Trends

Performance:

- ✓ Trends
- ✓ Overall Performance
- ✓ Page Conversion
- ✓ Country Conversions
- ✓ Conversion Trends
- ✓ Referrer Conversion
- ✓ Traffic Trends
- ✓ Keyword Conversions
- ✓ Time to Conversion
- ✓ Road To Sales
- ✓ Funnel Analysis
- ✓ Goals

Problems:

- ✓ Error Report
- ✓ Error Trends
- ✓ Bounce Rate
- ✓ Bounce Rate per Day
- ✓ Exit Rate
- ✓ Suspicious Traffic
- ✓ Log inspector

Client System:

- ✓ Browser Market Share
- ✓ Browser Breakdown
- ✓ Browser Versions

- ✓ Browser Trends
- ✓ Operating Systems
- ✓ OS Versions
- ✓ Mobile Operating Systems
- ✓ Mobile OS Versions
- ✓ Screen Resolution
- ✓ Color Palette
- ✓ Browsers by Country
- ✓ OS by Country
- ✓ Mobile User Agents
- ✓ Mobile Devices

Traffic:

- ✓ All Traffic by Month
- ✓ All Traffic by Day
- ✓ All Traffic by Hour
- ✓ Most Active Crawlers
- ✓ Crawler Trends
- ✓ All Traffic by Minute
- ✓ Bandwidth

Test Center:

- ✓ Content Based Split Test
- ✓ Time Based Split Test
- ✓ URL Based Split Test

We have currently not enabled the metrics below as we do not use these applications on our website www.eehub.eu, but may do so in the future and we will then update our **Privacy Note**:

X (Twitter):

- ✓ X (Tweets) Per Day
- ✓ X (Twitter) Compare
- ✓ X (Twitter) Feed
- ✓ X (Twitter) Find People
- ✓ X (Twitter) Followers
- ✓ X (Twitter) Following
- ✓ X (Twitter) Total Tweets

OpenCart:

- ✓ OpenCart Sales
- ✓ OpenCart Taxes
- ✓ OpenCart Products
- ✓ OpenCart Customers
- ✓ OpenCart Affiliates
- ✓ OpenCart Sales Per Country
- ✓ OpenCart Statuses

ZenCart:

- ✓ ZenCart Sales
- ✓ ZenCart Taxes
- ✓ ZenCart Top Customers
- ✓ ZenCart Top Products
- ✓ ZenCart Sales Per Country

MailChimp:

- ✓ MailChimp Campaign Forwards
- ✓ MailChimp Clicks
- ✓ MailChimp Stats
- ✓ MailChimp Bounces
- ✓ MailChimp Opens
- ✓ MailChimp List Stats
- ✓ MailChimp Facebook Likes
- ✓ MailChimp List Rate

LinkedIn:

- ✓ LinkedIn Followers By Day
- ✓ LinkedIn Impressions By Day
- ✓ LinkedIn New Followers By Month
- ✓ LinkedIn Total Followers
- ✓ LinkedIn Views By Month

We distinguish the following categories of «cookies»:

Technically Necessary: These cookies are necessary for the operation of the website, e.g. to protect it against hacker attacks and to ensure a consistent and demand oriented appearance of the site.

Analytical: These cookies are used to further optimize the user experience. This includes statistics provided to the website operator by third parties and the display of personalized advertising by tracking user activity across different websites.

Third Party Content: This website may offer content or functionality that is provided by third parties on their own responsibility. These third parties may set their own cookies, e.g. to track users' activity and to

personalize and optimize their offers. If you consent to the use of these cookies, you may be shown related advertisements. If you do not consent to them, you will not see less advertisements, but may be simply any other advertisement.

13. What data do we process on our social network pages?

We may operate pages e.g. LinkedIn and other online presences («fan pages», «channels», «profiles», etc.) on social networks and other platforms operated by third parties and collect the data about you described in **Section 3**, **Section 12** and below. We receive this data from you and from the platforms when you interact with us through our online presence (for example when you communicate with us, comment on our content or visit our online presence). At the same time, the platforms may analyze your use of our online presences and may combine this data with other data they have about you (for example about your behavior and preferences). They also process this data for their own purposes, in particular for marketing and market research purposes (for example to personalize advertising) and to manage their platforms (for example what content they show you) and, to that end, they act as separate controllers.

We receive data about you when you communicate with us through online presences or view our content on the corresponding platforms in case we are present on these platforms, visit our online presences or are active on them (for example publish content, submit comments). These platforms also collect technical data, registration data, communication data, certain behavioral data and preference data from you or about you, among other things (see **Section 3** and **Section 12** about these terms). These platforms usually perform statistical analysis of the way you interact with us, how you use our online presences and our content or other parts of the platform (what you view, comment on, «like», forward, etc.) and combine this data with other information about you (for example they may have information about your age and your gender and other demographic information). In that way, they create profiles about you and statistics on the use of our online presences. They use this data and profiles to display to you our or other advertisements and other personalized content on the platform and to manage the behavior of the platform, but also for market and user research and to provide us and other parties with information about you and the use of our online presence. We can control the analysis that these platforms generate regarding the use of our online presence only to some extent.

We process this data for the purposes set out in **Section 4**, in particular for communication, for marketing purposes (see **Section 12**) and for market research. You will find information about the applicable legal basis in **Section 5**. We may disseminate content published by you (for example comments on an announcement), for example as part of our advertising on the platform or elsewhere. We or the operators of the platforms may also delete or restrict content from or about you in accordance with their terms of use.

For further information on the processing of the platform operators, please refer to the privacy information of the relevant platforms. There you can also find out about the countries where they process your data, your rights of access and erasure of data and other data subject's rights and how you can exercise them or obtain further information. We currently use the following platform:

LinkedIn: On LinkedIn we operate the page <https://www.linkedin.com/company/energy-efficiency-hub>. The controller for the operation of the platform for users from Europe is LinkedIn city, country. Their privacy notice is available at LinkedIn Ireland Unlimited Company, Gardner House, Wilton Plaza, Wilton Place, Dublin 2, Ireland. The Data Controllers and Contracting Parties <https://www.linkedin.com/legal/privacy-policy>. With regard to the data collected and processed when visiting our site this is explained at <https://www.linkedin.com/legal/privacy-policy>.

14. Can we update this Privacy Notice?

This **Privacy Notice** is not part of a contract with you. We can change this Privacy Notice at any time. The version published on this website is the current version.

Last updated: **January 2024 (Version 1.0)**