

Information about the processing of personal data within the NEStore Cloud Application

Newton Energy Solutions B.V., with registered office at Delftechpark 26, 2628XH Delft, The Netherlands ("**Newton Energy Solutions**"), as the data controller ("**Controller**") hereby informs you in accordance with Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("**GDPR**") about the processing of personal data within the NEStore Cloud Application ("**Application**").

This document contains information about what personal data we process about data subjects, on what legal basis, for what purposes, to whom it may be transferred and what rights data subjects have in relation to the processing of personal data.

Data subjects and personal data processed

The controller processes the personal data of these data subjects:

- application users.

The controller processes the following personal data of data subjects:

- identification and contact details,
- login details to the Application,
- recorded activity within the Application,
- the type of the NEStore device for which the Application is used, its location within the object.

Purposes and legal basis of processing

The purposes of the processing of personal data by us are in particular:

- performance of the contract pursuant to Article 6 (1) (b) GDPR, which means making the Application available and ensuring its operation and operation of the connected device,
- legitimate interest pursuant to Article 6(1)(f) of the GDPR, which means the protection of the legitimate interests of the Controller in connection with the provision of the Application.

Method of processing personal data of the data subject

The Controller shall consistently protect personal data. Their processing takes place in electronic information systems, which are subject to strict physical, technical, and procedural controls. Processing may also be carried out manually. In order to protect personal data, the Controller has set up security mechanisms including technical, organizational and personnel measures. The Controller does not use automated decision-making or profiling when processing personal data.

Recipients or categories of recipients of personal data

In some cases, the Controller may use the professional and specialized services of other entities to process personal data, which usually act as processors and process personal data only on the basis of the Controller's instructions. A contract for the processing of personal data is concluded with each such entity, in which the processor has obligations to protect and secure personal data. In particular, processors or other recipients may be technical support providers. These processors do not process any personal data of data subjects for their own purposes. The Controller also transmits personal data to the administrative authorities and bodies specified by the applicable legislation in the performance of its legal obligations.

In some cases, personal data may also be transferred to recipients in countries outside the European Union and the European Economic Area. These countries may have different data protection laws and standards. Where no adequacy decision has been issued for these countries, the Controller has taken appropriate measures to ensure that personal data is processed in accordance with the GDPR, for example by entering into standard contractual clauses issued by the European Commission.

Storage period of personal data

The controller stores the personal data of data subjects processed for the above purposes only for the duration of your use of the Application. In the event that judicial, administrative, or other proceedings are initiated, personal data shall be processed to the extent necessary for the duration of such proceedings.

Rights of data subjects regarding the protection of personal data

Under the GDPR, data subjects have the following rights:

- Right of access to personal data (Article 15 GDPR)

Within the scope of the right of access, the Data Subject has the right to learn what data the Controller processes about him/her, for what purpose, for how long, from where he obtains the personal data, to whom he transfers it, who processes it outside the Controller and what other rights the Data Subject has related to the processing of personal data.

- Right to rectification (Article 16 GDPR)

If the Data Subject discovers that the personal data processed by the Controller about him/her are inaccurate or incomplete, he has the right to have them corrected or supplemented without undue delay.

- Right to erasure (Article 17 GDPR)

In some cases, the Data Subject has the right to have their personal data erased by the Controller. The Data Controller shall delete the personal data without undue delay if the consent given has been withdrawn, if it has been processed unlawfully or if it must be deleted to comply with a legal obligation.

- Right to restriction of processing (Article 18 GDPR)

In some cases, in addition to the right to erasure, the Data Subject may exercise the right to restrict the processing of personal data. This right allows the Data Subject to request, in certain cases, that the personal data be marked and not erased, but at the same time not be subject to any further processing operations beyond storage for a certain period of time.

- Right to data portability (Article 20 GDPR)

The data subject has the right to obtain from the Controller all of his personal data that he has provided to the Controller and that he processes automatically on the basis of his consent and on the basis of the performance of a contract. The Data Subject's personal data shall be provided by the Data Controller in a structured, commonly used and machine-readable format.

- Right to object to processing (Article 21 GDPR)

The data subject shall have the right to object to the processing of personal data which is based on the legitimate interest of the Controller. In such a case, the personal data will no longer be processed for the purpose in question unless the Controller has compelling legitimate grounds for continuing such processing.

- Right to lodge a complaint with a supervisory authority (Article 77 GDPR)

The data subject has the right to lodge a complaint with the Office for Personal Data Protection if he believes that the processing of his or her personal data has violated the personal data protection regulations.

Due to the scope of the processing of personal data, the Controller is not obliged to appoint a Data Protection Officer (DPO). You can contact the Controller with your questions, requests, objections and complaints regarding the processing and protection of personal data via the following contacts:

- By e-mail to: support@newtonenergy.nl
By mail to: Delftechpark 26, 2628 XH, Delft, The Netherlands