
PERSONAL DATA PROCESSING POLICY

General information notice of Hoffmann Frères Energie et Bois s.à r.l. 25 rue G.-D. Charlotte, L - 7520 Mersch, RCS B247356, (Electris), is a company active in the distribution of energy, and in the sale of energy.

1. Data collected from Electris customers

1.1 Data controller, contact

The data controller (Data Protection Officer) is Electris, represented by its current managing directors.

If you have any questions about your personal data, please contact Electris by email rgdp@electris.lu or by phone +352 32 00 72 - 40.

1.2 Data collected

Electris collects the data necessary to fulfil its contractual obligations to its customers.

The following data are collected:

- (a) First and last name, e-mail address, telephone numbers, date of birth of the customer, data on the composition of the household.
- (b) where applicable, information about the company, including name, physical address, size, financial data, data from opt-in lists, campaigns, surveys or publicly available information, status of the customer as a residential or business consumer, as well as business activity, identification data issued by public services (e.g. ID and passport numbers, tax number).
- (c) Electronic identification data (e-mail address, IP address, electronic signature, remote login data);
- (d) The client's financial details (e.g. IBAN account number), information about the means of payment (credit card, direct debit, ...), the amounts that are due and the payments that are sent to Electris.
- (e) Numbers identifying the energy meters, the physical location of the energy meters, the technical characteristics of the meters.
- (f) Energy consumption data: automatic or manual meter readings, on a periodic basis, type of energy.
- (g) The geographical location of each energy charging point used, the consumption data, the date and time of the start of any charging, the date and time of the end of any charging, the technical characteristics (amperage, voltage) of any charging.
- (h) The data on energy consumption at the point of supply specified in the energy supply contract or the energy connection contract respectively. This data shall include the consumption history, the consumption profile, such as seasonal and daily consumption variations, the historical consumption for the relevant previous years preceding the current year. Actual consumption shall be metered periodically (e.g. once a year), and at the end and beginning of the contract. In some cases, in the case of a so-called "smart meter", the actual consumption, and in particular the profile of this consumption, is read continuously.
- (i) If applicable, the identity and address of the electricity supplier.
- (j) Data on the configuration of the connections, such as the physical location of the meter, the power of the connection, and the description of the interface between the energy network and the

customer's wiring/piping. This includes the type and brand of the meter, its serial number, date of installation, exact location of its installation in the customer's home.

2. Data collection / origin

2.1 In general

In general the data is generated by Electris, or provided by the Customer himself, as well as by the suppliers and operators of the networks in which the Customer uses charging services (if the customer has subscribed to such charging services). They may be enriched by databases made available by official authorities (e.g. the trade and company register), or by databases made publicly available by third parties. In some cases, Electris obtains personal data from other electricity suppliers, who act on behalf of the customer.

There may also be occasions where Electris collects information about non-customers where this is strictly necessary. This may be the case where contact details are provided by the customer themselves, for example, a member of the customer's family; an heir or successor of the customer, an agent of the customer, a landlord, a debtor (e.g. in the event of bankruptcy), a shareholder, a representative of a legal entity.

2.2

Data are collected through different channels:

- (a) At the start of business, through telephone and email/mail exchanges with Electris sales representatives.
- (b) On the Internet, from the dedicated customer area, (e.g. the energy consumption monitoring area).
- (c) By providing application forms and online applications.
- (d) Through mobile applications developed by Electris.
- (e) By e-mails and letters that are returned by the customer following surveys (e.g. satisfaction surveys) offered by Electris.
- (f) By browsing Electris' websites, through cookies, web beacons and other similar technologies.

2.3

Data is also collected from third parties, in particular from network operators responsible for carrying out energy transmission and distribution activities.

Electris collects consumption data from the operators of the electricity terminals.

2.4

If the customer has consented, Electris may collect personal data from joint holders of contracts entered by the customer, third parties who have a mandate to enter a contract or service in the name of the customer and on behalf of the customer.

If the customer has consented, Electris may also collect personal data from its private and commercial partners.

3. Purposes of the processing

3.1

Electris collects this information in order to manage its accounts, fulfil its contractual obligations, manage the electricity network and assess the risks inherent in its business.

The main task is to supply, respectively transport and distribute energy, as well as to charge electricity at charging points, but it may also include ancillary tasks, such as the implementation of identification and security measures to prevent abuse and fraud, the definition of counterparty risk (credit risk), the monitoring of the quality of services (recording of telephone calls, discussions, e-mails), providing information to the customer, answering his requests, and keeping evidence of transactions.

3.2

Data is also collected to communicate to the customer, according to the customer's preferences, information related to their contracts and the management of these, or information related to the latest news from Electris (newsletters, information on new offers, etc.), to monitor the quality of the services provided by Electris, to process requests and complaints.

3.3

The data is also collected for the purpose of debt collection, collection of sums due, follow-up of payment.

Financial data are also collected in order to offer the customer comfortable payment methods (e.g. "SEPA" direct debits)

3.4

Electris may collect data relating to individuals for the purpose of entering a business relationship, for commercial prospecting, in compliance with applicable regulations.

Electris also collects data to maintain a good knowledge of customers, to collect customer satisfaction and expectations, to define new goods and services.

3.5

Electris also collects this information to comply with its legal obligations, for example, to respond to official requests from public, administrative or judicial authorities insofar as they are authorised by law.

4. Data transfer

4.1 Business secrecy

Business secrecy prevents Electris from disclosing any data or information of the Client to third parties except as provided by law.

4.2 Sale, marketing of data

Electris does not sell or market personal identification data of its customers to third parties. Electris does not sell financial identification data to third parties.

4.3 Transfer to third parties

The data collected is intended for use by Electris' internal departments and its subcontractors (IT service providers, collection service providers, customer relations service providers), and by energy distribution network operators, when it is necessary for the performance of the tasks entrusted to them.

Electris communicates the necessary data to network operators, chargepoint operators and electricity suppliers for the purpose of connection management, distribution network management and management of metering installations.

4.4

Electris may communicate the data to supervisory, financial, fiscal, judicial, administrative, or state agencies, such as the supervisory authority for the electricity sector, the Luxembourg Regulation Institute, and to other operators in the energy sector.

This communication may include customer identification data, financial data, customer energy consumption data.

4.5 Transfer to a third country

The data is stored within the European Union, either by Electris or by its service providers (subcontractors).

Electris does not transfer data to third countries.

5. Duration of data retention

5.1 Electricity network data

Data relating to the task of the distribution system operator shall be kept without time limit.

5.2 Data processed in the context of an energy supply contract

Electris retains personal data for as long as necessary to comply with applicable regulatory commitments, or for a period defined by its operational constraints, effective customer relationship management, as well as to respond to legal requests or requests from authorities and regulators.

Electris may retain the data for the duration of the contractual relationship and for 10 years after the end of the contractual relationship, respectively 10 years from the end of the financial year to which the information relates to comply with its obligations to retain accounting documents and supporting evidence as set out in the Commercial Code.

6. Rights of the persons concerned

Under the Data Protection Act, the Customer has the right to access, modify and object to the processing of his personal data, the right to erasure and the right to portability of his personal data. These rights can only be exercised within the limits of any contractual or legal obligation. The customer may also lodge a complaint with the Luxembourg supervisory authority, namely the National Commission for Data Protection.

7. Changes to the data protection policy

Electris may change its data protection policy because of developments in information technology and also in technologies relating to the production, transmission and storage of energy.

The latest version of the data protection policy is available at www.electris.lu