

Corab One Application

Application Privacy Policy

Corab One Application is dedicated to Users who are Owners of photovoltaic installations or to Installers of photovoltaic installations who own CORAB devices.

The controller processes data transferred by a CORAB device within the scope of Corab One Application as the service provider of Corab One Application and as the manufacturer of the CORAB device for maintenance and warranty purposes.

Who is your data controller?

The controller, that is the entity which decides how and for what purposes your data are processed, is the company of Corab S.A. with its registered office in Olsztyn, address: ul. Michała Kajki 4, postal code 10-547 Olsztyn, entered into the register of entrepreneurs of the National Court Register under number 0000950779, whose registration files are kept by the District Court in Olsztyn, 8th Commercial Division of the National Court Register, with the share capital in the amount of PLN 1,184,000.00, paid-up in full, having tax identification NIP: 7390207757 and statistical number REGON: 510519084.

The controller appointed a Data Protection Officer in the person of Katarzyna Krzywicka, e-mail: ido@corab.com.pl. In all matters concerning the personal data processing, please contact our Data Protection Officer.

How do we protect your personal data?

We know very well that personal data are an asset. We are also aware of threats related to personal data processing through the use of the internet. That is why we use our best efforts to offer a suitable protection method for your data and to ensure their security.

Always when the data processing requires involvement of external providers, we guarantee that we carefully select the entities we cooperate with to ensure a suitable security standard for the data provided to us.

The document you are reading is based on regulations on data protections, among others, GDPR provisions (General Data Protection Regulation of 27 April 2016) and the Act of 10 May 2018 on personal data protection. Already at this point, however, we would like to inform you that not all GDPR rights will apply to you absolutely and with regard to all personal data processing activities.

What data do we process, for what purpose and on what grounds?

We process data for the following purposes and on the following legal basis:

- For correct performance of the Application agreement and the warranty agreement which applies to a CORAB device functioning within your photovoltaic installation (based on art. 6 section 1 letter b GDPR);
- For the purpose of contact with you by using the Application or for a purpose related to the services (based on art. 6 section 1 letter b GDPR or based on art. 6 section 1 letter f GDPR);
- For marketing purposes based on art. 6 section 1 letter a GDPR and art. 6 section 1 letter f GDPR (your voluntary consent and/or legitimate interest of the controller, which is to conduct marketing and promotional activities);
- For archiving and evidence purposes (based on art. 6 section 1 letter f GDPR; legitimate interest of the controller is the possibility to collect data in order to prove facts);
- To consider complaints based on art. 6 section 1 letter b GDPR and art. 6 section 1 letter c GDPR (consideration of complaints is our statutory obligation);
- To ensure correct settlement and fulfilment of tax law obligations in accordance with the law (based on art. 6 section 1 letter c GDPR);
- To determine, pursue and defend against claims based on art. 6 section 1 letter f GDPR (the legitimate interest of the controller is to have personal data which allow to determine, pursue, or defend against claims of persons using the website or of third parties)

When are we the processing entity?

We hold the status of a processing entity with regard to data of third parties, which Users add to the Application by themselves. That is why, in such a case, we conclude a personal data processing agreement between you, the User (in that case, as the data controller) and us as the processing entity. The agreement is concluded when the User accepts the respective checkbox in Corab One Application, having familiarized themselves with the personal data processing agreement.

CORAB S.A.- data processing within the scope of warranty and maintenance services

Since we want you to have full transparency as regards our data processing within the scope of Corab One Application, we hereby explain that the data transferred by your CORAB ENCOR device to Corab One Application are processed for the purpose of performance of the agreement on making available and using Corab One Application as well as for the purpose of fulfilment of our warranty and maintenance obligations as the manufacturer of the CORAB device. Access to your data allows us to perform preliminary diagnostics and to quickly react to possible problems with your photovoltaic installation, which the CORAB device is a part of.

What rights do you have in connection with the processing of your personal data?

GDPR grants the following rights related to personal data processing – however, they are not of absolute nature and in some cases, you will not be able to exercise them:

- (A) **Right of access to information** – this means that each data subject has the right to know what happens to their personal data. The present privacy policy has been developed, among others, for that purpose.

- (B) **Right of access to personal data** – this means that if we as the controller of your personal data receive a request from you to access your personal data, we are obliged to provide you with that information. As the data controller, we have to fulfil our obligations in that regard immediately, not later than within one month. If it is not possible within that period, we are obliged to at least inform you whether we process your data, and then we can prolong the period for issuing of a comprehensive reply to your request by two months.
- (C) **Right to rectify personal data** – this means that you can request that the controller of your data rectifies incorrect data or supplements incomplete data.
- (D) **Right to remove personal data, right to be forgotten** – this means that you can request that we as the controller of your personal data, remove them and inform the person to whom your data have been provided about their removal. You also have the right to request that your data which have been made public by us are removed by other controllers as well. As the controller of your data, we are also obliged to inform you at your request to which recipients your data which are to be removed have been provided.
- (E) **Right to restrict the processing of personal data** – this means that you can request restriction of the processing of your personal data. This is the case, for example, if you do not agree with correctness of the processed data or when you find that the data are no longer needed for processing purposes.
- (F) **Right to object against the processing of personal data** – this means that you can object against the processing of your data by the controller.
- (G) **Right to transfer data** – this means that after certain conditions are fulfilled, you can request that your data are transferred directly to another controller indicated by you.
- (H) **Right to file a complaint** – this means that if you find that the processing of your data by us infringes upon legal provisions, you may file a complaint with the President of the Personal Data Protection Office.

If you wish to exercise your right, write at the address: ido@corab.com.pl . In all matters concerning the processing of personal data by us, please contact our Data Protection Officer.

Withdrawal of the consent for data processing

If the processing of personal data is conducted based on a consent, you can withdraw that consent at any time, at your discretion. If you wish to withdraw your consent for personal data processing, you just need to send an e-mail message directly at the address indicated in the introduction to this Privacy Policy.

If the processing of your personal data was conducted based on your consent, its withdrawal does not make the processing of your personal data until such time illegal. In other words, until you withdraw your consent, we have the right to process your personal data and withdrawal of your consent does not affect the legality of the previous processing.

Requirement to provide personal data

Provision of personal data is voluntary and depends on your decision, but provision of specified personal data is necessary to fulfil your expectations concerning conclusion of the agreement or the use of our services within the scope of the Application.

If the requirement to provide your data results from provisions of the law, it is your obligation to provide the data.

Automated decision making and profiling

Your data are not used by us for automated making of decisions which could affect your legal situation or have other similarly significant consequences for you.

The tools implemented within the scope of the Application can profile user behaviour in order to improve the website and to adjust the displayed content to preferences of the user, but in that case, the data analysed are mainly anonymous (location, interests).

To whom do we transfer your personal data?

Your personal data can be transferred to third parties whose services we use in connection with provision of the Application.

Entities which process data within the European Economic Area:

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| Deloitte Advisory spółka z ograniczoną odpowiedzialnością sp.k. z siedzibą w Warszawie 00-133, Al. Jana Pawła II 22 | Provider of IT services |
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Withdrawal of the consent for data processing

If the processing of personal data is conducted based on a consent, you can withdraw that consent at any time, at your discretion. If you wish to withdraw your consent for personal data processing, you just need to send an e-mail message directly at the address of the controller, which you shall find in the section “Who is the controller of my data?”.

If the processing of your personal data was conducted based on your consent, its withdrawal does not make the processing of your personal data until such time illegal. In other words, until you withdraw your consent, we have the right to process your personal data and withdrawal of your consent does not affect the legality of the previous processing.

Requirement to provide personal data

Provision of some of your personal data results from legal regulations and is mandatory (it is your obligation). Other data, for example those we process based on your consent, are provided by you voluntarily, however, provision of certain personal data is necessary for the Application functionalities to fulfil their purpose.

Automated decision making and profiling

Your data are not used by us for automated making of decisions which could affect your legal situation or have other similarly significant consequences for you.

For how long do we process your personal data?

According to the binding provisions of the law, we process your data only for the period necessary to achieve the set purpose. After that time, your personal data shall be irretrievably removed or destroyed.

We process your data for the period of:

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| Using the Application (the time for which you decide to use your Account if you are a user) or the term of the agreement | With regard to personal data processed for the purpose of using the Application functionalities. |
| Prescription of claims | With regard to personal data processed based on respective generally binding regulations. |
| Until effective filing of an objection or until the processing purpose is fulfilled | With regard to personal data processed based on the legitimate interest of the controller. |

User account

When creating a user account, you have to provide your basic data, such as e-mail address, name and surname/company name, phone number, address, data on your business activity in the case of users being Installers of photovoltaic installations, and password. You can modify your data assigned to the account at any time, using the options available after you log into the Application.

The legal basis for the processing of your personal data included in the user account is performance of the account operation agreement you conclude with us based on the Saas Agreement for Corab One Application.

Your personal data included in the user account are processed for the time of the functioning of the account, that is for the term of the account operation agreement referred to above. At any time, you can decide to remove your account, which will also result in removal of your personal data from the Application database.

Within the framework of our warranty/maintenance obligations, your personal data processed within the scope of the Application and provided by the CORAB device shall be processed until the end of the prescription period for claims.

Should you have any questions or doubts, do not hesitate to contact us.

Final provisions

Finally, we would like to remind you that the contents of the present Policy may be amended, for example, when we change a service supplier or the scope of the Application functionalities. For your convenience, the date of the latest Policy update is indicated at the beginning of the Policy.

That is all we wish to inform you about. Should you have any questions concerning the processing of your personal data by us, you are welcome to contact our Data Protection Officer Katarzyna Krzywicka, e-mail address: ido@corab.com.pl. In all matters concerning personal data processing, please contact our Data Protection Officer.