

PRIVACY NOTICE

Last updated February 8, 2024

Thank you for choosing to be part of our community at Power Dot, S.A., doing business as Power Dot (“Power Dot”, “we”, “us”, or “our”). We are committed to protecting your personal information and your right to privacy.

When you visit our website <https://www.powerdot.pt>, and use our services, you may trust us with your personal information. We take your privacy very seriously.

In this privacy notice, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important.

This privacy policy applies to all information collected through our website (such as <http://www.powerdot.pt>), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the “Sites”). **Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.**

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1. Who are we?

Power Dot, S.A., is a company organized and existing under the laws of Portugal, with its registered office located at Rua Mouzinho da Silveira, no. 15, 1250 - 166 Lisboa, and registered with the Commercial Registry Office under 514790342 (“Power Dot”, “we”, “us” or “our”).

These are our contacts:

Power Dot, S.A.

Address: Rua Carlos Alberto da Mota Pinto nº 17, 6B, 1070-313, Lisboa, Portugal.

E-mail: support@powerdot.pt

Power Dot is the controller of your personal data, deciding which personal data is collected and the means and purposes for which they are processed.

2. What information do we collect?

Personal information you disclose to us

***In Short:** We collect personal information that you choose to provide to us such as name, address, contact information, passwords and security data, and payment information.*

We collect personal information that you voluntarily provide to us when using our products or services, when expressing an interest in obtaining information about us or our products and services, when participating in activities on the Sites or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us and the Sites, the choices you make and the products and features you use. The personal information we collect can include the following:

Identification and Contact Data. We collect your first and last name, email address, postal address, phone number, taxpayer number and other similar contact data.

Credentials. We collect passwords, password hints, and similar security information used for authentication and account access.

Payment Data. We collect data necessary to process your payment if you make purchases, such as RFID card number of the eMobility Service Provider (EMSP) and credit card data.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

3. How do we use your information?

***In Short:** We process your information in a licit and transparent manner and for specific purposes.*

We only use personal information collected via our Sites whenever there is a lawful basis for the processing and for specific purposes.

Below you can find the purposes for which we process your personal data and the respective lawful basis for such processing:

Performance of a contract

Purposes	Description
Onboarding on web app	Registry and activation of users on a web app.
Processing your payments	Insertion of data on a web app to pay your purchases.

Compliance with legal obligations

Purposes

Invoicing

Description

We collect and process personal data for billing charging services.

Providing information and response to requests from public authorities

If we receive a subpoena or other legal request, we may need to inspect the data we hold to respond.

Consent

Purposes

Sharing information with business partners

Description

If you provide us with your consent, we will share information with business partners (such as managing entities or owners of parking lots) to improve the service provided, namely by providing you with access to promotions and other offers.

Legitimate interests of Power Dot

Purpose

Performance of commercial and contract communications

Legitimate interest

Execution of contracts between Power Dot and other companies

Description

We identify the legal representatives and contact points of counterparties in contracts in which Power Dot is a party to execute such contracts and contact the counterparties.

Audit and technical analysis

Ensuring the systems used by Power Dot are secure and that technical issues are properly addressed

We have implemented processes to manage and monitor information systems and processes to detect, analyze and respond to incidents involving the systems security or bugs.

Analysis and detection of potential fraud

Ensuring that the execution of the services is performed in a lawful and regular manner

We have implemented processes to detect fraud within the usage of our services.

Evaluation of the satisfaction of services	Assessing and ensuring the satisfaction of its clients	We perform inquiries on the satisfaction of our clients regarding Power Dot services and products.
Direct Marketing	Providing relevant information on Power Dot services and products that may be of interest to the clients	We may contact you through automated calling and communication systems, SMS, email, and other types of similar applications, to promote the acquisition of products and services that may interest you.

4. Will your information be shared with anyone?

***In Short:** We only share information with other entities (different from Power Dot) if we have a legal basis to do it.*

We may share your personal information with the following entities:

- **Companies of Power Dot Group:** We may share or transfer your information with other companies of the Group when information or procedures are needed from one of the Group companies to proceed with the purposes provided for in this Policy.
- **Public Authorities:** we may share or transfer your information with public authorities whenever there is a legal obligation to do so (for example, if we receive a subpoena).
- **Service providers:** we may share or transfer your information to our service providers, which act on behalf and under the instructions of Power Dot (for example, invoicing entities).
- **Business partners:** if you provide us with your consent, we may share information with our business partners (such as managing entities or owners of parking lots) to improve the service provided, namely by providing access to promotions and other offers.

5. How long do we keep your information?

***In Short:** We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy unless a longer retention period is required or permitted by law.

Reasons for keeping your information

Performance of a contract

Retention period

Duration of the contract. Power Dot may keep your personal data for periods longer than the duration of the contractual relationship, namely to ensure rights or duties related to the contract (for example, for the defense of Power Dot in legal proceedings)

	related to the performance of the contract).
Compliance with legal obligations	Period provided for by law (for example, invoices will be retained for 10 years).
Audit and technical analysis	1 year.
Analysis and detection of potential fraud	1 year.
Evaluation of the satisfaction of services	2 years, from the last acquisition of Power Dot products.
Direct Marketing	2 years, from the last acquisition of Power Dot products.

When your personal information is no longer needed for fulfilling the processing purposes specified in this privacy policy, we will either delete or anonymize it.

6. How do we keep your information safe?

***In Short:** We aim to protect your personal information through a system of organisational and technical security measures.*

We have implemented appropriate technical and organisational security measures designed to protect the security of any personal information we process, namely against its unauthorized destruction, access and alteration, including: encryption of data for the transmission and the storage, control of accesses to the data, use of digital signatures, and the implementation of monitoring and audits processes.

7. What are your privacy rights?

***In Short:** You have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.*

You have the following rights under applicable data protection laws:

– **Right to access and to obtain a copy of your personal information**

Without prejudice of third parties' rights, you have the right to access to your personal data and to obtain information on how such data is processed (for example, the purposes of the processing, the categories of data concerned, the recipients or categories of recipient of such data, the envisaged retention periods and your rights in relation to such processing).

– **Right to rectification**

You have the right to obtain from the controller without undue delay the rectification of inaccurate personal data and to have incomplete personal data completed.

– **Right to erasure**

You have the right to obtain the erasure of your personal data in the situations provided for in the applicable laws and unless any of the legal grounds for the retention of the data is verified (for example, when the processing is necessary for compliance with a legal obligation to which Power Dot is subject or for the exercise or defense of legal claims).

– **Right to restriction of the processing**

You have the right to obtain the restriction of processing where (i) you have contested the accuracy of the personal data, for a period enabling Power Dot to verify its accuracy, (ii) the processing is unlawful and you have opposed the erasure of the personal data, (iii) Power Dot no longer needs the personal data for the purposes of the processing, but they are required for the establishment, exercise or defence of your legal claims, (iv) you have objected to processing of your personal data, pending the verification whether the legitimate grounds of Power Dot override yours.

– **Right to data portability**

In some cases, you have the right to receive the personal data that you have provided to Power Dot in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

– **Right to object:**

Whenever the processing is performed based on a legitimate interest of Power Dot you have the right to object to such processing, on grounds relating to your situation.

You also have the right to object to the processing of your personal data for direct marketing purposes at any time, in which case Power Dot will no longer process data for such purposes.

– **Right to withdraw consent:**

Whenever Power Dot is relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

– **Right to lodge a complaint with the Data Protection Supervisory Authority:**

If you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You

can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm

8. Do we make updates to this Privacy Policy?

In Short: Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

9. How can you contact us about this Policy or to exercise your rights?

If you have questions or comments about this policy, or if you want to exercise any of your rights, referred to on section 7. above, you may:

- _ Email us at support@powerdot.pt or
- _ Contact us by post to:

Power Dot SA.
Rua Carlos Alberto da Mota Pinto n.º 17, 6B
1070-313, Lisboa, Portugal