

SEW Privacy Policy

This Privacy Statement describes Smart Energy Water's ("SEW") general privacy practices that apply to personal information we collect, use and share about consumers and other individuals within our clients, business partners, supplier and other organizations with which SEW has or contemplates a business relationship. At SEW, we recognize the importance of protecting your personal information and are committed to processing it responsibly and in compliance with applicable data protection laws in all countries in which SEW operates.

This Privacy Statement is supplemented by the SEW Online Privacy Statement, which provides more information in the online context, including recruitment. We may provide additional or more specific information on the collection or use of personal information on websites or related to a specific product or service.

Why and how we collect and use your personal information.

We may collect your personal information as an individual for various purposes, such as the following:

- **Access and use of websites or other online services**
When entering one of our websites, or using an online service, we will record information necessary to provide you with access, for the operation of the website and for us to comply with security and legal requirements in relation to operating our site, such as passwords, IP address and browser settings. We also collect information about your activities during your visit in order to personalize your website experience, such as recording your preferences and settings, and to collect statistics to help us improve and further develop our websites, products and services.
- **Responding to your request for information, order, or support**
When you contact us (online or offline) in connection with a request for information, to order a product or service, to provide you with support, or to participate in a forum or other social computing tool, we collect information necessary to fulfill your request, to grant you access to the product or service, to provide you with support and to be able to contact you. For instance, we collect your name and contact information, details about your request and your agreement with us and the fulfillment, delivery and invoicing of your order and we may include client satisfaction survey information. We retain such information for administrative purposes, defending our rights, and in connection with our relationship with you.

When you provide your name and contact information to register in connection with such a request, the registration may serve to identify you when you visit our websites. For ordering of most services and products we require you to have registered an SEWid. Registration may also allow you to customize and control your privacy settings.

- **Your use of SEW Cloud services**
We collect information about your use of SEW Cloud services to enable product features to operate, improve your user experience, tailor our interactions with you, inform our clients on the overall use of the services, provide support and improve and develop our products and services. For details regarding the technologies we employ, the personal information we collect, as well as how to control or block tracking or to delete cookies, please refer to the SEW Online Privacy Statement.
- **Contacting employees of our clients, prospects, partners and suppliers**
In our relationship with clients or prospects, partners and suppliers, they also provide us with business contact information (such as name, business contact details, position or title of their employees, contractors, advisors and authorized users) for purposes such as contract management, fulfillment, delivery of products and services, provision of support, invoicing and management of the services or the relationship.
- **Visitor information**

We register individuals visiting our offices and client sites (name, identification and business contact information) and use camera supervision for reasons of security and safety of persons and belongings, as well as for regulatory purposes.

- **Marketing**

Most information we collect about you comes from our direct interactions with you. When you register for an event we may collect information (online or offline) in relation to the event organization, and during an event, such as participation in sessions and survey results. We combine the personal information we collect to develop aggregate analysis and business intelligence for conducting our business and for marketing purposes. You can choose to receive information by email, telephone or postal mail about our products and services, or sign-up for subscriptions. When visiting our websites or using our services we may provide you with personalized information. You can always opt-out from receiving personalized communication by sending an e-mail to FinOps@smartenergywater.com. More information can be found in the SEW Online Privacy Statement.

Where we reference that we use your personal information in connection with a request, order, transaction or agreement (or preparing for the same), or to provide you with services that you requested (such as a website), we do this because it is necessary for the performance of an agreement with you.

Where we reference that we use your personal information in relation to marketing, improvement or development of our products or services, for reasons of safety and security, or regulatory requirements other than in connection with your agreement or request, we do this on the basis of our or a third party's legitimate interests, or with your consent. When we collect and use your personal information subject to the EU Privacy Legislation this may have consequences for Your Rights.

Sharing of Personal Information

As a global organization offering a wide range of products and services, with business processes, management structures and technical systems that cross borders, SEW has implemented global policies, along with standards and procedures, for consistent protection of personal information. As a global company, we may share information about you with our subsidiaries world-wide and transfer it to countries in the world where we do business in accordance with this Privacy Statement.

Between SEW controlled subsidiaries we only grant access to personal information on a need-to-know basis, necessary for the purposes for which such access is granted. In some cases, SEW uses suppliers located in various countries to collect, use, analyze, and otherwise process personal information on its behalf.

Where appropriate, SEW may also share your personal information with selected partners to help us provide you, or the company you work for, products or services, or to fulfill your requests, or with your consent. When selecting our suppliers and partners, we take into account their data handling processes.

If SEW decides to sell, buy, merge or otherwise reorganize businesses in some countries, such a transaction may involve the disclosure of personal information to prospective or actual purchasers, or the receipt of such information from sellers. It is SEW's practice to require appropriate protection for personal information in these types of transactions.

Please be aware that in certain circumstances, personal information may be subject to disclosure to government agencies pursuant to judicial proceeding, court order, or legal process. We may also share your personal information to protect the rights or property of SEW, our business partners, suppliers or clients, and others when we have reasonable grounds to believe that such rights or property have been or could be affected.

International Transfers

The international footprint of SEW involves a large number of transfers of personal information between different subsidiaries, as well as to third parties located in the countries where we do business. Some countries have implemented transfer restrictions for personal information, in connection with which SEW takes various measures, including:

Where required, SEW implements Standard Contractual Clauses approved by the EU Commission, or similar contractual clauses in other jurisdictions. This includes transfers to suppliers or other third parties. You can request a copy of the EU Standard Contractual Clauses by contacting us at FinOps@smartenergywater.com.

Information Security and Accuracy

We intend to protect your personal information and to maintain its accuracy. SEW implements reasonable physical, administrative and technical safeguards to help us protect your personal information from unauthorized access, use and disclosure. For example, we encrypt certain sensitive personal information such as credit card information when we transmit such information over the Internet. We also require that our suppliers protect such information from unauthorized access, use and disclosure.

Retention Period

We will not retain personal information longer than necessary to fulfill the purposes for which it is processed, including the security of our processing complying with legal and regulatory obligations (e.g. audit, accounting and statutory retention terms), handling disputes, and for the establishment, exercise or defense of legal claims in the countries where we do business.

Because the circumstances may vary depending on the context and the services, the information provided in Online Privacy Statement or provided in a specific notice may provide more detailed information on applicable retention terms.

How to Contact Us

If you have a question related to this Privacy Statement, please contact us by using this form. Your message will be forwarded to the appropriate member of SEW's Data Privacy Team, such as Data Protection Officers or members of their teams.

For the purposes of the EU General Data Protection Regulation (GDPR), the controller of your personal information is Smart Energy Systems, Inc. dba Smart Energy Water (SEW), 19900 MacArthur Blvd., Suite 370, Irvine, CA 92612, unless indicated otherwise. Where SEW or a subsidiary it controls (not established in the European Economic Area (EEA)) is required to appoint a legal representative in the EEA, the representative for all such cases is Smart Energy Water Private Limited IDA Business and Technology Park, Garrycastle, Dublin Road, Athlone, Co. Westmeath. N37 F786, Ireland.

SEW is not the controller in situations such as:

- Personal information processed in connection with a contractual relationship, or with entering into a contractual relationship with a specific SEW subsidiary. In this case the controller of personal information is the SEW contracting company, which is the legal entity with which you or your employer have, or will have, the contract.
- Personal information collected on the physical site or location of an SEW subsidiary. In this case that subsidiary is the controller of the personal information.

Your Rights

You can request to access, update or correct your personal information. You also have the right to object to direct marketing. You can access the request process [here](#).

You may have additional rights pursuant to your local law applicable to the processing. For example, if the processing of your personal information is subject to the EU General Data Protection Regulation ("GDPR"), and your personal information is processed based on legitimate interests, you have the right to object to the processing on grounds relating to your specific situation. Under GDPR you may also have the right to

request to have your personal information deleted or restricted and ask for portability of your personal information.

Right to Lodge a Complaint

In the event you consider our processing of your personal information not to be compliant with the applicable data protection laws, you can lodge a complaint:

- Directly with SEW at FinOps@smartenergywater.com.
- With the competent data protection authority

Changes to our Privacy Statements

From time to time we may update this Privacy Statement, as well as any other specific privacy statement. When making changes to this Privacy Statement, we will add a new date at the top of this Privacy Statement.