

PRIVACY POLICY

Your privacy is important to FOCAL CHARGE. We've developed a Privacy Policy that covers the information FOCAL CHARGE may collect, use, share and protect. Your use of FOCAL CHARGE's charging services (the "Charging Services") and our website, mobile app, and EV driver/Fleet portal (the "Web Services"), collectively, "Services", is subject to the following Privacy Policy. Please take a moment to familiarize yourself with our privacy practices.

CHANGES TO PRIVACY POLICY

In order to strengthen the protection of your personal information or due to changes in law, we may change and update this privacy policy from time to time, so you should check back this page for the updated policy. For any significant changes affecting your personally identifiable information, we will post a more prominent notice to the Web Site of the change. If you disagree with any change, you must stop using the Service. Otherwise, we will consider your continued use to be acceptance of the change. FOCAL CHARGE smartphone app makes it possible for EV (Electric Vehicle) users to book the charging session time slot online, Reschedule and Cancel the same. However, the availability displays may keep updating as per the reservation and cancellation occurrences. If there is data missing from your app, it may not be possible to continue to the next page, so please be sure to fill in ALL necessary information in app.

INFORMATION COLLECTION AND USAGE

We automatically receive certain types of information whenever you use our Services, including information about your electric vehicle, computer and online activities. For example, when you access our website or app, we may automatically collect your devices' and computer's IP address, the date and time of your access, the type of browser you use, information about your computer's or mobile device's operating system, your location and the specific services accessed. Information we may collect when we provide you Charging Services includes the time and date of your access of the charging network, the duration of your charging session, how much power you consume during a charging session, the location of the network charging station you utilize, information on your vehicle that enables us to identify it and the state of charge of your battery at the beginning and end of your charging session. FOCAL CHARGE may also analyse and compile information on patterns of usage of the Charging Services. We may use this information to improve our Services and provide this information in aggregated and/or anonymized form to third parties for marketing purposes. Some of this information is automatically collected through systems or tracking tools such as cookies, tracking pixels, and web beacons. Cookies allow us to track use of our Services and to enable features to our webpages.

When you register for Services, contact us, or participate in an online survey or poll, we will collect information from you (like name, e-mail address, mobile number, credit card or other means of payment, etc.). When using our Services, you may also be asked for additional information to help identify you. All of this information used to specifically identify you is called "User Information" in this Privacy Policy. We retain User Information

in order to process your service requests, respond to your inquiries, identify you and otherwise communicate with you as a customer. We only collect User Information that you provide to us or have given us permission to collect. We will also use personal information about you to improve our marketing and promotional efforts, optimize existing services for our customers, develop new services, analyse our Web Services usage, improve our content, deliver information to you that are targeted to your interests and improve customer experience.

From time to time, we may use User Information to send important notices, such as communications about our Services and Associates Services, your account or changes to our terms, conditions, and policies. Because this information is important to your interaction with FOCAL CHARGE, you may not opt out of receiving these communications.

HOW WE SHARE INFORMATION

While we take steps to protect your personal information, sometimes information is shared with third parties. We may share information with third parties that is in aggregated or anonymous form so that it does not divulge personal information, and may work with those entities to do research, including for marketing purposes, and improve our Services and provide new services. Your personal information may also be shared with third parties for the following purposes:

- To process your booking and in accordance with your requests;
- When necessary to comply with the law, an order from a court with competent jurisdiction or regulatory agency;
- To assist with identity verification, and to prevent fraud and identity theft;
- To protect the rights, property and safety of FOCAL CHARGE or our customers;
- To perform services on FOCAL CHARGE's behalf;
- To obtain payment for Services, including the transfer or sale of delinquent accounts to third parties for collection; or
- If FOCAL CHARGE or substantially all of its assets are transferred through merger, acquisition, bankruptcy or any other change of corporate control, then personal information will be transferred with the assets and may be disclosed as part of any such transaction.

DATA SECURITY

FOCAL CHARGE will take precautions to protect your information at least as stringent as those it uses to protect company confidential information from loss, misuse or alteration. We do not sell your personal information to anyone for any purpose, including any third parties for their direct marketing purposes, without your consent. Agents, contractors and partners of FOCAL CHARGE who require access to your personal information in order to provide services to you on our behalf are also required to keep the information confidential in a manner consistent with this Privacy Policy and are not permitted to disclose the information to third parties or use the information for any purpose other than to carry out the services they are performing for FOCAL CHARGE. We maintain information about you in our business records while you are a customer, or until it is no longer needed for business, tax, or legal purposes. Information that we collect from you

will be destroyed safely and securely in a way that reduces the chance of any unauthorized access of such information in accordance with our data retention policy and applicable law. We have implemented encryption or other appropriate security controls to protect personal information when stored or transmitted by FOCAL CHARGE.

ACCESSING USER INFORMATION

We will try to update your User Information as we become aware of changes; however, we will be able to serve you best if you update your User Information or notify us of any changes to (or errors in) your User Information. You can update your User Information through our FOCAL CHARGE mobile app, emailing us at support@focalcharge.com.

ACCEPTANCE OF PRIVACY POLICY

By using our Services or becoming a customer of FOCAL CHARGE you signify your acceptance of this Privacy Policy. If you do not agree to any of the terms in this Privacy Policy, please do not submit any personal information to FOCAL CHARGE or request to become a customer as FOCAL CHARGE will be unable to provide its Services and products to you.