



## Milence<sup>1</sup> Privacy Statement

*Last updated 6 August 2024 – Approved for external release.*

We, Commercial Vehicle Charging Europe's (CVCE), are responsible for the processing of your personal data. In this privacy statement we will explain to you what we use your personal data for.

This privacy statement is aimed at everyone who has contact with us, when using our services or visiting our website.

When using our Milence App, please find the privacy statement [here](#).

### What personal data we collect and how we use it

The types of data we collect and use is limited to the information that you provide us, including information:

- You provide when you when you contact us or when you apply for a job opening,
- Shared with us by visiting our website (such as cookies); and
- Signing up for our newsletter;
- When you visit one of our charging hubs;
- When register for one of our (corporate) events;
- When you attend one of our (corporate) events;
- When you visit our offices;
- When you conclude a contract with us and if we perform a due diligence check.

We will never share or sell your personal information to anyone without your knowledge or approval. We will only share authorised information with third parties if they are contracted by us to facilitate the delivery of our services to you or if we are under a legal obligation to hand over information to public authorities.

### The categories of personal data we collect and how we use the personal data

Below you will find a description of what personal data we collect and process per activity, what the purposes are, and what the legal basis is for processing this data. We only use data that is directly provided by you in the following activities.

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<sup>1</sup> The brand Milence is used in this document to refer to Commercial Vehicle Charging Europe B.V. and all its (direct and indirect) subsidiaries.

Activity	Personal data categories	Purpose	Legal basis
Applying for a job on the Milence Careers website	<ul style="list-style-type: none"> <li>• Name;</li> <li>• Date of birth;</li> <li>• Nationality;</li> <li>• Contact information;</li> <li>• Resume/CV information;</li> <li>• Any other personal data that you provide during the job search, application, or interview process with us.</li> </ul>	<ul style="list-style-type: none"> <li>• To evaluate and verify your education, skills, experiences and other qualifications and interests in connection with open roles at Milence,</li> <li>• To communicate with you regarding the interview process, and inform you of potential career opportunities,</li> <li>• To prepare offers of employment, including as it relates to compensation,</li> <li>• To improve our recruitment process, including by generating anonymised data and analysis using candidate data, and perform pre-employment background checks where permitted by law.</li> </ul>	Consent
Subscribing to our newsletter via our website	<ul style="list-style-type: none"> <li>• Name;</li> <li>• Contact information.</li> </ul>	To send you our newsletter.	Consent

Activity	Personal data categories	Purpose	Legal basis
		<p>You can withdraw your consent at any time by clicking on the unsubscribe link at the bottom of a newsletter. If you withdraw your consent, your name and e-mail address will be removed from our mailing list.</p>	
<p>Contacting our office for partnerships</p>	<ul style="list-style-type: none"> <li>• Name;</li> <li>• Contact information.</li> </ul>	<p>We will retain email, regular mail, telephone conversation minutes to respond to your enquiry or to record your request or complaint.</p>	<p>Performance of a contract</p>
<p>Improving our services</p>	<ul style="list-style-type: none"> <li>• Interaction with our content (e.g. measure total amount of likes and engagement).</li> </ul>	<p>Our content on third party websites, applications, integrations or platforms, may obtain information regarding your interaction with that content. We do so, among others, to improve our services.</p>	<p>Legitimate Interests</p>

Activity	Personal data categories	Purpose	Legal basis
When you visit one of our charging hubs	<ul style="list-style-type: none"> <li>Surveillance (video) material</li> </ul>	To ensure the safety and security of people- and Milence property	Legitimate interests
When you visit our offices	<ul style="list-style-type: none"> <li>First name, Last name, License plate, Date and Time.</li> </ul>	To provide access to the Milence premises and parking	Legitimate interests
Registration for (corporate) events	<ul style="list-style-type: none"> <li>First name, Last name, Email, Company, Dietary requests, Allergy requests.</li> </ul>	To register you for Milence (corporate) events  To keep you up to date and send you essential information about the event.	Legitimate interest
Taking and publishing photos and videos from (corporate) events	<ul style="list-style-type: none"> <li>Photos and video material</li> </ul>	We will take photos and videos at our (corporate) events. This photo and video material may be published on different social media channels and/or the Milence website. You may always object to the use of your personal data in this manner.	Legitimate interests
When you conclude a contract with us as a	<ul style="list-style-type: none"> <li>Name (first and last name)</li> <li>Email</li> <li>Phone number</li> </ul>	To (1) conclude a contract with us in the context of performing	Performance of a contract and

Activity	Personal data categories	Purpose	Legal basis
supplier and carrying out a due diligence check	<ul style="list-style-type: none"> <li>• Signature</li> <li>• Screening information</li> </ul>	activities for us and (2) to verify information about the company and identify potential risks.	legitimate interests

In our lobbying process with public officials, we may use data that is not provided by public officials directly, to contact public officials in order to promote our services. Including, by way of example, invitations to events organized by us and more broadly to interact with stakeholders on our topics of interest. This is done on the basis of legitimate interest.

### Surveillance at the charging hubs

The Milence charging hubs are placed under video surveillance to ensure the safety of individuals and property at and around charging hub (including amenities, entrance and exit) and Milence domestic authority, security of access to charging hub, protection of organizational property against destruction, vandalism, fire, theft and similar, recording of incidents and subsequent use for legal claims as evidence. As such, we have a legitimate interest in placing such surveillance. In case of an incident, this data is shared with legal advisors, official authorities, research organizations and/or governmental institutions. If (technical) assistance is required, data is accessible to service providers.

### Sharing information with third parties

We do not disclose your personal data to third parties for their independent use in any way unless:

1. You request or authorise it;
2. The information is provided for law enforcement reasons or to comply with the law (for instance a court order), enforce an agreement we have with you, or to protect our rights;
3. The information is provided to entities that provide services for us though not acting as processors;
4. The information is provided to processors or service providers who perform functions on our behalf.

### Transferring personal data outside of the European Economic Area

Information we collect from you will be processed by our contracted third parties, with whom we have a contractual agreement. Contracted third parties may be processing your personal data within and outside the European Economic Area (EEA). When personal data is transferred outside of the EEA, we make sure that the appropriate supplemental safeguards are in place to ensure



an adequate level of the protection of your data in accordance with the General Data Protection Regulation (GDPR).

### **Data retention**

We keep your personal data to enable your continued use of our services, for as long as necessary in order to fulfil the relevant purposes described in this privacy statement, or as is required by law.

### **Security**

To help protect the personal data you transmit through usage of Milence's services, we maintain physical, technical, and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your personal data to only authorised staff members who need access. In addition, we train our staff members about the importance of confidentiality and maintaining the privacy and security of your information.

### **Your rights**

The GDPR provides you with the following rights:

- The right of access. This means you can make a request to obtain access to the personal data concerning you;
- The right to rectification or correction of your personal data;
- The right to erasure of the personal data concerning you;
- The right to restriction of the processing. This means you can ask us to restrict the processing of your personal data in some circumstances, such as when you contest the accuracy of the personal data;
- The right to data portability. This means that you have the right to receive your personal data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
- The right to object. This means you can object to our processing of your personal data and ask us to stop such processing at any time if we rely on our own or someone else's legitimate interests to process your personal data or where we process your personal data for direct marketing purposes.
- Right to Object to automated decision-making. This means you have the right not to be subject to a decision based solely on automated processing, including profiling. We do not use such automated decision-making in relation to our processing of your personal data described in this privacy statement.
- The right to withdraw your consent. If we rely on your consent for the processing of your personal data, such as with receiving our newsletters, you have the right to withdraw that consent at any time.

If you have any questions or wish to confirm what personal data we process, if you want to access to your personal data which we have stored, or want to exercise any other right, please contact us at [privacy@milence.com](mailto:privacy@milence.com). Reasonable



access to your personal data will be provided at no cost to you upon submitting a request to Milence within one month of the acknowledgement of the request. To confirm your identity we might ask you to provide additional information in order to fulfill your request.

If we cannot fulfill your request within 30 days, we will inform you about an expected date on which the information will be provided. Furthermore, we may require more information to verify your identification before fulfilling your request.

You also have a right to lodge a complaint with a supervisory authority. In the Netherlands, the supervisory authority is the Dutch Data Protection Authority ("Autoriteit Persoonsgegevens").

### **Changes and updates to this privacy statement**

As we develop and start rolling out our charging solutions this privacy statement will be updated accordingly. We reserve the right to amend this privacy statement at any time, for any reason. We will publish the amended privacy statement on our website. If required by law, you will be notified of any major changes to our privacy statement.

### **Questions, comments, or complaints**

If you have any questions or comments about this privacy statement or if you would like to obtain information about any of your personal information processed by us, please contact us via [privacy@milence.com](mailto:privacy@milence.com) or via:

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