

DATA STATEMENT Non-personal Data

The EU Data Act is a key piece of legislation that governs data access and usage across the European Union. It aims to ensure fair and transparent data sharing practices, giving individuals and businesses more control over data generated by connected devices, including bikes.

At Shuttel, we are committed to implementing solutions that comply with the EU Data Act. Our goal is to foster trust in data-driven services and support innovation.

For more information on the EU Data Act, you can follow this link to the EU legislation.

Your Data, Your Control

On this webpage we describe how non-personal data is generated by connected components, which at Shuttel specifically focuses on its operational services with charging stations. The non-personal data is processed for the legitimate purpose of providing you with important functionality of your charging station and its connected components.

We aim to make the non-personal data generated by your charging station more accessible and usable to you. In this context, we are committed to promoting data availability and access to the data generated by you and the connected components.

You can find additional details about the data generated by the connected components on your charging station in the table below:

Point of collection	Type of information	Format	Estimated volume of	Continuous and in real	Local or remote	Data retention period	Access and Management of
			data	time data	storage of		Data
			generated	collection	data		
Alfen	* Status information	* PDF	The amount	* Every 15	The data	The stored	<u>Users can access</u>
		(invoice)	of data per	minutes,	about the	logging typically	<u>data:</u> Not all
Charging	* Firmware version	* Excel	charging	charging	status of	covers a period	information can
Stations		(specific	session is	stations	Shuttel's	of several weeks	be accessed
Alfen Eve	* Model code of	ation)	minimal. The	supply the	charging	to months,	directly. Status of
Single	hardware		data is	back-office of	infrastructure	depending on	the charging
S-Line +			generated	Shuttel with	and about	storage capacity	station and an
Pro-Line,	* EVSE status		only during	an update	charging	and frequency of	overview of
and Alfen			active use of	(heartbeat)	sessions is	use. The amount	charge detail
Eve	* Charge detail record		the charging	with a date	stored both	of information	records
Double	information (i.e. date,		station and is	and	locally and	depends on the	(transaction) can
Pro-line			processed by	timestamp	remotely. The	charging station	be accessed
			Shuttel for		charging		directly via the



	timestamp, quantity, authorisation ID) Logging information		billing, management, and maintenance of the charging infrastructure.	* While the charging station is in use, it provides the backoffice with direct updates regarding events. For example, verify token, token accepted or rejected, start charging session, stop charging session) with a date and time stamp and logging information is recorded)	station temporarily stores basic information, which is automatically transferred to Shuttel's secure back-end system. Within this system all transaction data required for billing and charging station management is stored.	type and configuration. After termination of employment / customer relationship, the data is deleted after 18 months.	Shuttel App. For an overview of all (technical) logging information, a request can submitted to Shuttel's Customer Engagement Center (CEC). Users can delete data: Status information of the charging station is a live information-feed. CDR/transactiona I information must be kept in connection with tax legislation and regulations and the obligation for Shuttel to be able to substantiate its financial administration. Transactional data can (and will) be anonymized or pseudonymized. Website: https://alfen.com/nl-nl
Cube Laadpalen (Cube Smart)	Status information Firmware version Modelcode of hardware EVSE status (number of plugges being used/free) Charge detail record information (date + timestamp + percentage charged: all information between start and stop charge session) Logging information	* PDF (invoice) * Excel (specific ation)	The amount of data per charging session is minimal. The data is generated only during active use of the charging station and is processed by Shuttel for billing, management, and maintenance of the	* Every 15 minutes, charging stations supply the back-office of Shuttel with an update (heartbeat) with a date and timestamp * While the charging station is in use, it provides the backoffice with direct	The data about the status of Shuttel's charging infrastructure and about charging sessions is stored both locally and remotely. The charging station temporarily stores basic information, which is automatically	The stored logging typically covers a period of several weeks to months, depending on storage capacity and frequency of use. The amount of information depends on the charging station type and configuration After termination of employment / customer relationship, the	Users can access data: Not all information can be accessed directly. Status of the charging station and an overview of charge detail records (transaction) can be accessed directly via the Shuttel App. For an overview of all (technical) logging information, a request can



	charging	undatas	transferred to	data is deleted	submitted to
	charging	updates			
	infrastructure.	regarding	Shuttel's	after 18 months.	Shuttel's
		events. For	secure		Customer
		example,	back-end		Engagement
		verify token,	system. Within		Center (CEC).
		token	this system all		
		accepted or	transaction		<u>Users can delete</u>
		rejected, start	data required		<u>data:</u> Status
		charging	for billing and		information of the
		session, stop	charging		charging station
		charging	station		is a live
		session) with	management		information-feed.
		a date and	is stored.		CDR/transactiona
		time stamp			I information
		and logging			must be kept in
		information is			connection with
		recorded)			tax legislation
		,			and regulations
					and the
					obligation for
					Shuttel to be able
					to substantiate its
					financial
					administration.
					Transactional
					data can (and
					will) be
					anonymized or
					pseudonymized
					Website:
					https://cubecharg
					ing.com/
 I					

^{*} Shuttel relies on the suppliers of connected components to provide timely and accurate information about the data generated by the connected components on your charging station. The information above may be incomplete, and may be modified, added to, or supplemented as suppliers provide us with new information about the data generated by the connected components on your charging station.

The data generated by the charging station is processed at Shuttel's charging platform, from where the data directly relevant to the user is made available via the Shuttel app. This allows the user to monitor and, in some cases, control functions on their charging station (such as setting the energy rate). Please refer to the Annex to the Terms of Use of Shuttel for all purposes your data is used for.

You can stop Shuttel from processing the non-personal data generated by the connected components by terminating the charging service subscription. This is done by cancelling the management of your charging station by Shuttel. Once the management is cancelled, Shuttel will no longer manage your charging station, and the data collection by Shuttel will end. The charging station still generates the same data, but Shuttel no longer receives and processes it. If you also wish to delete your Shuttel account, including the

^{**} Please note that suppliers may develop additional applications that interact with one or more connected components. We kindly refer you to the provider of these applications for the data specifications and terms.



retroactive deletion of generated data, you can request this by sending a deletion request to <u>solutions@shuttel.nl</u> or via the access request form via our website.

Your Data: How to Access and Share It

At Shuttel, you have control over your data. Here's how you can request a copy of your data and, if you wish, share it with a third party.

Requesting Your Data

Would you like to receive a copy of the data we process about your Charging Station in the Shuttel App? Please fill in our request form on our <u>website</u> and send it to <u>solutions@shuttel.nl</u>.

After receiving your request, we will contact you to verify your request to receive data (and thus to prevent data from falling into the wrong hands) and to further process your request.

Important for Personal Data: If the data you're asking us to share contains personal data (meaning it can identify someone), and you're not the person the data is about, we can only share it if there's a valid legal reason under GDPR (the main EU privacy law). When you make such a request, you must clearly state your legal reason (like "consent" or "legitimate interest") for processing that personal data using the dedicated form here: link to form.

If your request involves sensitive personal data (like health information), we'll need to ask you for additional information to ensure all necessary conditions under GDPR Article 9 and the ePrivacy Directive are met.

Sharing Your Data with a Third Party

A third party can request an API by filling out the request form on our website (page 2).

Other possibility is that you simply forward the .csv file you receive from us to the party you wish to share the data with.

Contact

For more information on how we process your personal data when you have a charging station operated by Shuttel, use the Shuttel App, Shuttel's website, please visit the Shuttel website.

<u>Changes</u>

This statement was created 1 september 2025 . We may update this Data Statement from time to time. Changes to this Data Statement become effective when the revised statement is published.