

## Privacy policy of simplee AG

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## 1. **Controller and content of this privacy policy**

We, simplee AG, Im Schörli 5, 8600 Dübendorf (**Company**), are the operator of the website [www.simplee-energy.ch](http://www.simplee-energy.ch) (**Website**) and, unless otherwise stated in this privacy policy, are responsible for the data processing specified in this privacy policy.

Please take note of the information below to know what personal data we collect from you and for what purposes we use it. When it comes to data protection, we primarily adhere to the legal requirements of Swiss data protection law, in particular the Swiss Federal Act on Data Protection (**FADP**).

Please note that the following information may be reviewed and amended from time to time. We therefore recommend that you regularly review this privacy policy. Furthermore, for individual data processing listed below, other companies may be responsible under data protection law or jointly responsible with us, so that in these cases, the information provided by those companies is also relevant.

## 2. **Contact person for data protection**

If you have any questions about data protection or wish to exercise your rights, please contact our data protection contact person by sending an e-mail to the following address: [datenschutz@simplee-energy.ch](mailto:datenschutz@simplee-energy.ch)

## 3. **Scope and purpose of the collection, processing and use of personal data**

### 3.1 **Data processing when contacting us**

If you contact us via our contact addresses and channels (e.g., by e-mail, telephone number, or contact form), your personal data will be processed. The data that you provide us with, such as your name, e-mail address or telephone number, and your request, will be processed. In addition, the time of receipt of the request will be documented. Mandatory fields are marked with an asterisk (\*) in contact forms. We process this data in order to address your request (e.g., to provide you with information about our products and services, support you in the execution of contracts, incorporate your feedback to improve our products and services, etc.).

For the processing of contact requests submitted via contact form, we use a software application provided by Odoo S.A., Chaussée de Namur 40, 1367 Grand-Rosière, Belgium. Therefore, your data may be stored in a database of Odoo, which may allow Odoo to access your data if this is necessary for the provision of the software and for support in the use of the software. For information on the processing of data by third parties and any data transfer abroad, please refer to section 5 of this privacy policy.

### 3.2 **Data processing when using our support form**

If you send us a request for support via the Website, your personal data will be processed. The data you provide us with, e.g., type of request, your first and last name, telephone number, e-mail address, company name, problem, problem description, etc. will be processed. In addition, the time of receipt of the request will be documented. Mandatory fields are marked with an asterisk (\*). We process this data exclusively to address your request, i.e., to provide the requested support. To this end, we may also forward your support request to an appropriate partner who will provide the actual support service. For this purpose, we will forward the data that you provide to us via the support request and that is necessary for the provision of the support, to the partner. The partner is responsible for data protection in relation to the services provided by the partner and the associated data processing.

For the processing of support requests, we use a software application provided by Odoo S.A., Chaussée de Namur 40, 1367 Grand-Rosière, Belgium. Therefore, your data may be stored in a database of Odoo, which may allow Odoo to access your data if this is necessary for the provision of the software and for support in the use of the software. For information on the processing of data by third parties and any data transfer abroad, please refer to section 5 of this privacy policy.

### **3.3 Data processing in relation to quotation requests**

If you send us a quotation request via the Website, your personal data will be processed. The data you provide us with, e.g., name of the proposal, your first and last name, telephone number, e-mail address, company name, type of property, etc. will be processed. In addition, the time of receipt of the request will be documented. Mandatory fields are marked with an asterisk (\*). We process this data exclusively to address your request, i.e., to provide you with a quotation and to communicate with you in this context.

For the processing of quotation requests, we use a software application provided by Odoo S.A., Chaussée de Namur 40, 1367 Grand-Rosière, Belgium. Therefore, your data may be stored in a database of Odoo, which may allow Odoo to access your data if this is necessary for the provision of the software and for support in the use of the software. For information on the processing of data by third parties and any data transfer abroad, please refer to section 5 of this privacy policy.

### **3.4 Data processing when registering for webinars / workshops**

You can register for webinars/workshops via our Website. The data you provide us with, e.g., your first and last name, telephone number, e-mail address, company name, etc., will be processed. In addition, the time of receipt of the registration request will be documented. Mandatory fields are marked with an asterisk (\*). We process this data exclusively to process your registration for the webinar/workshop in question and to subsequently send you important information about the event.

For the processing of registrations for webinars/workshops, we use a software application provided by Odoo S.A., Chaussée de Namur 40, 1367 Grand-Rosière, Belgium. Therefore, your data may be stored in a database of Odoo, which may allow Odoo to access your data if this is necessary for the provision of the software and for support in the use of the software. For information on the processing of data by third parties and any data transfer abroad, please refer to section 5 of this privacy policy.

### **3.5 Data processing when registering as partner**

You can register as a partner via our Website. The data that you provide us with, e.g., your first and last name, telephone number, e-mail address, company name, etc., will be processed. In addition, the time of receipt of the registration request will be documented. Mandatory fields are marked with an asterisk (\*). We process this data exclusively to process your registration as a partner and to communicate with you in this context.

For registration purposes, we use a software application provided by Odoo S.A., Chaussée de Namur 40, 1367 Grand-Rosière, Belgium. Therefore, your data may be stored in a database of Odoo, which may allow Odoo to access your data if this is necessary for the provision of the software and for support in the use of the software. For information on the processing of data by third parties and any data transfer abroad, please refer to section 5 of this privacy policy.

### **3.6 Data processing when searching for partners**

On our Website, you can search for suitable partners who can advise you on services. The data you provide us with, e.g., your first and last name, telephone number, e-mail address, company name, etc., will be processed. In addition, the time of receipt of the request will be documented. Mandatory fields are marked with an asterisk (\*). We process this data exclusively to address your request and to communicate with you in this context. To this end, we may also forward your request to an appropriate partner in order to establish the connection between you and the partner. For this purpose, we will forward to the partner those data that you provide to us via the request. The partner is responsible for data protection in relation to the services provided by the partner and the associated data processing.

For the processing of requests, we use a software application provided by Odoo S.A., Chaussée de Namur 40, 1367 Grand-Rosière, Belgium. Therefore, your data may be stored in a database of Odoo, which may allow Odoo to access your data if this is necessary for the provision of the software and for support in the use of the software. For information on the processing of data by third parties and any data transfer abroad, please refer to section 5 of this privacy policy.

The partner search functionality also involves the use of the Google Maps service. For persons from Switzerland and the European Economic Area, this map service is provided by Google Ireland Limited, Google Building Gordon House, 4 Barrow St, Grand Canal Dock, Dublin 4, D04 V4X7, Ireland. In order to integrate the Google Maps material that we use, your web browser, when accessing our Website, may establish a connection to a server operated by Google, which may also be located in the USA. By integrating the map material, Google receives the information that a page of our Website has been accessed from your device's IP address. If you access the Google Maps service on our Website while logged into your Google profile, this may also be linked to your Google profile. If you do not wish to link this to your Google profile, you should log out of your Google account before accessing our Website.

For more information, please refer to Google's privacy policy (<https://policies.google.com/privacy?hl=en>) and the additional terms of use for Google Maps ([https://www.google.com/help/terms\\_maps/](https://www.google.com/help/terms_maps/)).

In case of data transfer to the USA, we refer to the standard contractual clauses (<https://cloud.google.com/terms/data-processing-terms>) as well as the information on data transfers to the USA provided in section 5.3 below.

### **3.7 Data processing in connection with Partnership**

#### **3.7.1 Registration**

You can log in/register for our Partnership via our Website. The data you provide us with, e.g., your first and last name, telephone number, e-mail address, company name, etc. will be processed. In addition, the time of receipt of the registration will be documented. Mandatory fields are marked with an asterisk (\*). We process this data exclusively to check your registration for the Partnership and to communicate with you in this context.

For the processing of the registration, we use a software application provided by Odoo S.A., Chaussée de Namur 40, 1367 Grand-Rosière, Belgium. Therefore, your data may be stored in a database of Odoo, which may allow Odoo to access your data if this is necessary for the provision of the software and for support in the use of the software. For information on the processing of data by third parties and any data transfer abroad, please refer to section 5 of this privacy policy.

### **3.8 Data processing in connection with the download hubs**

The download hub is located on our profile on Notion, which means that you will be redirected to Notion's website when you go to the download hub.

Notion is provided by Notion Labs, Inc, 548 Market St #74567, San Francisco, CA 94104-5401, USA (Notion). The collected data is stored on an online storage (Cloud) provided by Notion. Information on how Notion handles your personal data can be found in Notion's privacy policy: <https://www.notion.so/Privacy-Policy-3468d120cf614d4c9014c09f6adc9091>.

In case of data transfer to the USA, we refer to the standard contractual clauses (<https://www.notion.so/Data-Processing-Addendum-361b540101274b1fa7e16b90402b0d99>) as well as the information on data transfers to the USA provided in section 5.3 below.

### **3.9 Data processing when using customer services**

You can make use of numerous customer services for which the processing of personal data may be required. This includes, for example, the import/sale of charging stations and accessories, second level support for charging stations and chargers, project services for property owners, as well as the operation and maintenance of charging stations for landlords and administrations.

In connection with these services, we primarily process contact details of contact persons, e.g., first and last name, telephone number, e-mail address and company name. Only exceptionally, in the case of operational and maintenance services, we may have access to usage and analysis data or consumption data. However, it is not necessary for the provision of our services to process this data, and, without separate information, we will not do so.

We use the data to provide the services you have requested and to communicate with you regarding the services you have ordered.

We store this data together with the details, timing, and content of the requested service in our CRM database (see section 4) to ensure proper processing of the requested service. If necessary for the contract fulfilment, we may also disclose on the required information to any third-party service providers.

With certain charging stations, end users can download an app that allows them to administer the operation and maintenance of the charging station. The apps also provide a dashboard-like overview of consumption. The providers of the apps are the respective manufacturers and distributors of the charging stations. They are also responsible for the data processing via the app. The users of the app accept the terms and conditions and the privacy policy of the providers with the download and any subsequent registration. For instance, regarding easee and the easee app, please see : <https://easee.com/uk/privacy/>. We only obtain access to this data if the users of the app grant us appropriate access rights or share the relevant data with us. We will process the relevant data exclusively within the scope of our service provision and not for our own purposes.

### **3.10 Data processing in relation to e-mail marketing**

We reserve the right to send information via e-mail about our services, products, and events to our current business partners. In addition, we inform our current customers by e-mail about problems with products.

We use your data for sending marketing e-mails until you opt out. You have the right to object at any time, particularly by using the unsubscribe link found in all marketing e-mails.

Our marketing e-mails may contain a web beacon, 1x1 pixel (tracking pixel), or similar technical tools. A web beacon is an invisible graphic that is linked to the user ID of the respective subscriber. For each marketing e-mail sent, we receive information about which e-mail addresses it was successfully delivered to, which e-mail addresses have not yet received the marketing e-mail, and which e-mail addresses the delivery has failed for. It is also shown which e-mail addresses have opened the marketing e-mail and for how long, as well as which links have been clicked. Finally, we also receive information about subscribers who have unsubscribed from the mailing list. We use this data for statistical purposes and to optimise the frequency and timing of e-mail delivery, as well as the structure and content of the marketing e-mails. This allows us to better tailor the information and offers in our marketing e-mails to the individual interests of the recipients. The web beacon is deleted when you delete the marketing e-mail. You can prevent the use of web beacons in our marketing e-mails by adjusting the settings of your e-mail program so that HTML is not displayed in messages. You can find information on how to configure this setting in the help documentation of your e-mail software application, e.g., [here](#) for Microsoft Outlook. For sending marketing e-mails, we use a software application provided by Odoo S.A., Chaussée de Namur 40, 1367 Grand-Rosière, Belgium. Therefore, your data may be stored in a database of Odoo, which may allow Odoo to access your data if this is necessary for the provision of the software and for support in the use of the software. For information on the processing of data by third parties and any data transfer abroad, please refer to section 5 of this privacy policy. You can withdraw your consent at any time for the future.

For the mass dispatch of e-mails, we also use the product "Postmark", from the US-based service provider Wildbit LLC, 2400 Market Street, Suite 235B Philadelphia, PA 19103 USA. You can find more details about Postmark's data processing at: <https://postmarkapp.com/eu-privacy>. Sending may be done through the Postmark e-mail marketing tool (<https://postmarkapp.com/>). For more information on the transfer of personal data to the USA, see section 5.3.

### **3.11 Data processing in relation to job applications**

You can apply for a position in our Company either spontaneously or in response to a specific job advertisement. In both cases, we will process the personal data you provide us with.

We use the data you provide us with to assess your application and suitability for employment. Application documents from unsuccessful applicants will be deleted at the end of the application process, unless you explicitly agree to a longer retention period, or we are legally obliged to retain them for a longer period.

For the processing of applications, we use a software application provided by Odoo S.A., Chaussée de Namur 40, 1367 Grand-Rosière, Belgium. Therefore, your data may be stored in a database of Odoo, which may allow Odoo to access your data if this is necessary for the provision of the software and for support in the use of the software. For information on the processing of data by third parties and any data transfer abroad, please refer to section 5 of this privacy policy.

Through our Website, you can also link to a third-party website on which our open positions are advertised and where you can apply for these positions. This third-party site is operated by JOIN Solutions AG, Eichenstrasse 2, 8808 Pfäffikon SZ (Schwyz). JOIN Solutions AG is responsible for the data processing on the relevant website. The privacy policy, which you must accept in each case when entering data on the JOIN Solutions AG website, can be found at <https://join.com/privacy-policy>. We are only responsible for data protection from the moment we receive the applicant data from JOIN Solutions AG.

### **3.12 Data processing when using Google Workspace**

In connection with the provision of our services and our work, we use the services of Google Workspace. The Google Cloud services are provided by Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland.

We use the cloud and cloud software services offered by Google (so-called Software as a Service, e.g., Google Suite) for the following purposes: storing and managing documents, managing calendars, sending e-mails, creating spreadsheets and presentations, exchanging documents, content, and information with specific recipients, publishing web pages and forms, and other content and information, as well as engaging in chats and participating in audio and video conferences.

In this context, the users' personal data is processed to the extent that it becomes part of the documents and content processed within the described services or is part of communication procedures. This may include, for example, users' master data and contact information, data on transactions, contracts, other processes, and their content. Google also processes usage data and metadata for security and service optimisation purposes.

For more information, please see Google's privacy policy (<https://www.google.com/policies/privacy>) and Google's cloud services security notices (<https://cloud.google.com/security/privacy/>).

In case of data transfer to the USA, we refer to the standard contractual clauses (<https://cloud.google.com/terms/data-processing-terms>) as well as the information on data transfers to the USA provided in section 5.3 below.

## **4. Central data storage and analysis in CRM / ERP system**

If a clear identification of your person is possible, we will store and link the data described in this privacy policy, i.e., your personal information, contact details, contract data, and your browsing behaviour on our Website in a central database. This allows for efficient management of customer data, enables us to adequately process your requests, and facilitates the efficient provision of the services you requested, as well as the performance of the related contracts.

We also analyse this data to further develop our products and services based on your needs and to provide you with the most relevant information and offers. We also use methods that predict possible interests and future orders based on your use of our Website.

For the central storage and analysis of data in the ERP system, we use a software application provided by Odoo S.A., Chaussée de Namur, 40, 1367 Grand Rosière, Belgium. Therefore, your data may be stored in a database of Odoo S.A., which may allow Odoo S.A. to access your data if this is necessary for the provision of the software and for support in the use of the software. For information on the processing of data by third parties and any data transfer abroad, please refer to section 5 of this privacy policy. For more information about data processing by Odoo S.A., please refer to <https://www.odoo.com/privacy>.

## **5. Transfer and transmission abroad**

### **5.1 Disclosure to and access by third parties**

Without the support of other companies, we would not be able to provide our products and services in the desired form. In order for us to be able to use the services of these companies, a disclosure of your personal data to these companies is also necessary to a certain extent. A disclosure is limited to selected third-party service providers and only to the extent necessary for the optimal provision of our services.

Various third-party service providers are already explicitly mentioned in this privacy policy. Additionally, our web hosting provider, GoDaddy, should also be mentioned. We use the website building solution provided by Go Daddy Operating Co LLC, 14455 North Hayden Road Suite 226 Scottsdale, AZ 85260, USA (**GoDaddy**), for the purpose of hosting and displaying the Website. All data collected on our Website is processed on GoDaddy's servers. For more information about GoDaddy's privacy practices, please refer to <https://www.godaddy.com/legal/agreements/privacy-policy>. We have entered into a data processing agreement with GoDaddy (available at <https://www.godaddy.com/de-de/legal/agreements/data-processing-addendum>), by which we oblige the provider to protect our customers' data and not to disclose it on to third parties.

Your data will also be disclosed, for example, to providers of other services, to the extent this is necessary for the execution of the contractual relationship. In accordance with data protection regulations, these third-party service providers are considered data controllers, not us. It is the responsibility of these third-party service providers to inform you about their data processing activities – which go beyond the transfer of data for the provision of services – and to comply with data protection regulations.

On our Website, we use a web service provided by Google Ireland Limited, Gordon House, Barrow Street, 4 Dublin, Ireland (hereinafter referred to as Gstatic). We use it to ensure the full functionality of our Website. In this context, your browser may transmit personal data to Gstatic. The server domains used for CDNs are s.w.org and twemoji.maxcdn.com. They are only used for a fast and secure transmission of files. The personal data of the users will be deleted after transmission. The data is deleted once the purpose of its collection has been fulfilled. For more information about the handling of the transmitted data, please refer to Gstatic's privacy policy: <https://policies.google.com/privacy>. You can prevent the collection and processing of your data by Gstatic by disabling the execution of script code in your browser or by installing a script blocker in your browser.

In addition, your data may be disclosed, in particular to authorities, legal advisors, or debt collection agencies, if we are legally obliged to do so or if this is necessary to protect our rights, in particular to enforce claims arising from our relationship with you. Data may also be disclosed if another company intends to acquire our Company or parts thereof and such disclosure is necessary to conduct due diligence or to complete the transaction.

## **5.2 Transfer of personal data abroad**

We are entitled to transfer your personal data to third parties abroad if this is necessary to carry out the data processing mentioned in this privacy policy. Individual data transfers are described in section 3 above. When making such transfers, we will ensure compliance with the applicable legal requirements for disclosing personal data to third parties. The countries to which data is transferred include those which, according to a decision of the Federal Council, have an adequate level of data protection (such as the member states of the EEA), but also those countries (such as the USA) whose level of data protection is not considered adequate (see Annex 1 of the Data Protection Ordinance (DPO)). If the country in question does not have an adequate level of data protection, we ensure, unless an exception is specified for the individual data processing, that your data is adequately protected by these companies by means of appropriate safeguards. Unless otherwise stated, these are standard contractual clauses that can be found on the website of the [Federal Data Protection and Information Commissioner \(FDPIC\)](#). If you have any questions about the implemented measures, please reach out to our data protection contact person (see section 2).

## **5.3 Information on data transfers to the USA**

Some of the third-party service providers mentioned in this privacy policy are based in the USA. For the sake of completeness, we inform users residing or based in Switzerland or the EU that in the USA, there are surveillance measures placed by US authorities which generally allow the

storage of all personal data of all individuals whose data has been transferred from Switzerland or the EU to the USA. This is done without any differentiation, limitation, or exception based on the objective pursued and without any objective criterion that would make it possible to limit the access of the US authorities to the data and their subsequent use to very specific, strictly limited purposes that justify both the access to these data and their use. In addition, we point out that in the USA, there are no legal remedies or effective judicial protection against general access rights of US authorities for the affected individuals from Switzerland or the EU, which allow them to access their data and request its correction or deletion. We explicitly inform you about this legal and factual situation to enable you to make an informed decision regarding your consent to the use of your data.

We would also like to point out to users who are resident in Switzerland or a member state of the EU that, from the perspective of the European Union and Switzerland, the USA does not have an adequate level of data protection - among other things, due to the statements made in this section. As far as we have explained in this privacy policy that recipients of data (such as Google) are located in the USA, we will ensure through contractual arrangements with these companies and, if necessary, additional appropriate guarantees, that your data is adequately protected with our third-party service providers.

## **6. Background data processing on our Website**

### **6.1 Data processing when visiting our Website (log file data)**

When you visit our Website, the servers of our hosting provider GoDaddy, Tempe, Arizona, USA store (see further information in section 5.1 above), store every access in a log file. The following data is collected without your intervention and stored by us until automatically deleted:

- IP address of the requesting computer;
- date and time of access;
- name and URL of the accessed file;
- website from which the access was made, if applicable, with the search word used;
- operating system of your computer and the browser you are using (including type, version, and language setting);
- device type in case of access from mobile phones;
- city or region from which the access was made; and
- name of your internet service provider.

The collection and processing of this data is carried out for the purpose of enabling the use of our Website (establishing a connection), ensuring the long-term security and stability of the system, and enabling error and performance analysis and optimisation of our Website (see also section 6.3 regarding the latter points).

In case of an attack on the network infrastructure of the Website or suspicion of other unauthorised or improper use of the Website, the IP address and other data will be analysed for clarification and defence purposes; if necessary, they may be used in civil or criminal proceedings for the identification of the respective user.

Finally, when you visit our Website, we use cookies, as well as other applications and tools that rely on the use of cookies. In this context, the data described here may also be processed. For

more information, please refer to the subsequent sections of this privacy policy, in particular to section 6.2.

## **6.2 Cookies**

Cookies are information files that your web browser stores on the hard drive or in the memory of your computer when you visit our Website. Cookies are assigned identification numbers that enable your browser to be identified, and allow the information contained in the cookie to be read.

Cookies are used to make your visit to our Website easier, more enjoyable, and more meaningful. We use cookies for various purposes that are necessary for the desired use of the Website, i.e., "technically necessary." For example, we use cookies to identify you as a registered user after logging in, so you don't have to log in again when navigating to different subpages. The provision of ordering functions also relies on the use of cookies. Furthermore, cookies perform other technical functions necessary for the operation of the Website, such as load balancing, which distributes the workload of the site across various web servers to relieve the servers. Cookies are also used for security purposes, such as preventing the unauthorized posting of content. Finally, we use cookies in the design and programming of our Website, for example, to enable the uploading of scripts or codes.

Most internet browsers accept cookies automatically.

You may also be able to configure your browser to prevent cookies from being stored on your computer or receive a notification whenever a new cookie is being sent. On the following pages, you will find instructions on how to configure cookie settings for selected browsers.

- [Google Chrome for Desktop](#)
- [Google Chrome for Mobile](#)
- [Apple Safari](#)
- [Microsoft Windows Internet Explorer](#)
- [Microsoft Windows Internet Explorer Mobile](#)
- [Mozilla Firefox](#)

Disabling cookies may prevent you from using all the features of our Website.

## **6.3 Tracking and web analytics tools**

### **6.3.1 General information on tracking**

For the purpose of customising and continuously optimising our Website, we use the web analytics services listed below. In this context, pseudonymised usage profiles are created, and cookies are used (please also see section 6.2). The information generated by the cookie regarding your use of our Website is usually transmitted to a server of the service provider, where it is stored and processed, together with the Log File Data mentioned in section 6.1. This may also result in a transfer to servers abroad, e.g., the USA (for information on the absence of an adequate level of data protection and the proposed safeguards, see sections 5.2 and 5.3).

By processing the data, we obtain, among others, the following information:

- navigation path followed by a visitor on the site (including content viewed, products selected or purchased, or services booked);
- time spent on the Website or specific page;
- the specific page from which the Website is left;
- the country, region, or city from where an access is made;
- end device (type, version, colour depth, resolution, width, and height of the browser window); and
- returning or new visitors.

The provider, on our behalf, will use this information to evaluate the use of the Website, in particular to compile Website activity reports and provide further services related to Website usage and internet usage for the purposes of market research and the customisation of the Website. For these processing activities, we and the providers may be considered joint controllers in terms of data protection to a certain extent.

You can withdraw your consent or oppose to processing at any time by rejecting or deactivating the relevant cookies in the settings of your web browser (see section 6.2) or by using the service-specific options described below.

Regarding the further processing of the data by the respective provider as the (sole) controller, including any potential disclosure of this information to third parties, such as authorities due to national legal regulations, please refer to the respective privacy policy of the provider.

### 6.3.2 LinkedIn Analytics

We use the conversion tracking technology of LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA, or, if you are a resident of the EU, LinkedIn Ireland, Wilton Plaza, Wilton Place, Dublin 2, Ireland (**LinkedIn**) on our Website.

This includes the LinkedIn Insight Tag, a small snippet of JavaScript code, integrated into our Website, which allows us to create detailed campaign reports and gain valuable information about our Website visitors. We use the LinkedIn Insight Tag to track conversions, retarget our Website visitors, and gain additional information about LinkedIn members who view our Website. With this technology, for instance, we can provide you with interest-specific and relevant offers and recommendations on LinkedIn, based on your interactions with services, information, and offers on our Website. Additionally, we can generate anonymous reports on the performance of ads and information on Website interaction.

The LinkedIn Insight Tag generates a cookie that collects the following data: URL, referrer URL, IP address, device and browser characteristics (user agent), as well as timestamps and page views. IP addresses are either truncated or (if used to reach members across devices) hashed. The direct identifiers of members are removed within seven days to pseudonymise the data. This remaining pseudonymised data is then deleted within 180 days.

LinkedIn also uses data that does not identify you to improve the relevance of ads and reach members across devices. LinkedIn members can control the use of their personal data for advertising purposes in their account settings.

Privacy policy: <https://www.linkedin.com/legal/privacy-policy>

Cookie policy: <https://www.linkedin.com/legal/cookie-policy>

Opt-out: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>. To prevent the execution of JavaScript code altogether, you can also install a JavaScript blocker, such as the browser plugin NoScript (e.g., [www.noscript.net](http://www.noscript.net) or [www.ghostery.com](http://www.ghostery.com)).

Google Analytics

## 6.4 Social media

### 6.4.1 Social media plugins

On our Website, you can use social media plugins from the following providers:

- Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, [Privacy Notice](#);
- Twitter International Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2, Ireland, [Privacy Notice](#);
- LinkedIn Unlimited Company, Wilton Place, Dublin 2, Ireland, [Privacy Notice](#);
- Pinterest Inc. at 651 Brannan Street, San Francisco, CA 94107, USA, [Privacy Policy](#);
- WhatsApp Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, [Privacy Notice](#).

We use the social media plugins to make it easier for you to share content from our Website. The social media plugins help us to increase the visibility of our content on social networks, thereby contributing to better marketing.

The content of the plugin is transmitted directly from the social network to your browser and integrated into the Website. As a result, the respective provider receives information that your browser has accessed the corresponding page of our Website, even if you do not have an account with that social network or are not currently logged in to it. This information (including your IP address) is transmitted from your browser directly to a server of the provider (usually located in the USA) and stored there (for information on the absence of an adequate level of data protection and the proposed safeguards, see sections 5.2 and 5.3). We have no influence on the scope of data collected by the provider through the plugin, although from a data protection perspective, we may be considered joint controllers with the providers up to a certain extent.

If you are logged into the social network, it can assign your visit to our Website directly to your user account. If you interact with the plugins, the corresponding information is also transmitted directly to a server of the provider and stored there. The information (e.g., that you like a product or service from us) may also be published on the social network and displayed to other users of the social network. The provider of the social network may use this information for the purpose of displaying advertisements and tailoring the respective offering to your needs. For this purpose, usage, interest, and relationship profiles may be created, e.g., to evaluate your use of our Website with regard to the advertisements displayed to you on the social network, to inform other users about your activities on our Website, and to provide other services associated with the use of the social network. The purpose and scope of the data collection, further processing and use of the data by the providers of the social networks, as well as your rights in this regard and options for protecting your privacy can be found directly in the privacy policies of the respective providers.

If you do not want the provider of the social network to associate the data collected through our Website with your user account, you must log out of the social network before activating the

plugins. You can withdraw your consent at any time by notifying the plugin provider in accordance with the instructions provided in its privacy policy.

## 6.5 Online advertising and targeting

### 6.5.1 In general

We use services of various companies to provide you with interesting offers online. In the process of doing this, your user behaviour on our Website and websites of other providers is analysed in order to subsequently be able to show you online advertising that is individually tailored to you.

Most technologies for tracking your user behaviour (**Tracking**) and displaying targeted advertising (**Targeting**) utilise cookies (see also section 6.2), which allow your browser to be recognised across different websites. Depending on the service provider, it may also be possible for you to be recognised online even when using different end devices (e.g., laptop and smartphone). This may be the case, for example, if you have registered for a service that you use with several devices.

In addition to the data already mentioned, which is collected when visiting Websites (**Log File Data**, see section 6.1) and through the use of cookies (section 6.2) and which may be transmitted to the companies involved in the advertising networks, the following data, in particular, is used to select the advertising that is potentially most relevant to you:

- information about you that you provided when registering or using a service from advertising partners (e.g., your gender, age group); and
- user behaviour (e.g., search queries, interactions with advertisements, types of websites visited, products or services viewed and purchased, newsletters subscribed to).

We and our service providers use this data to determine whether you belong to the target audience we address and take this into account when selecting advertisements. For example, after visiting our Website, you may see advertisements for the products or services you have viewed when you visit other sites (**Re-targeting**). Depending on the amount of data, a user profile may also be created, which is automatically analysed; the advertisements are then selected based on the information stored in the profile, such as belonging to certain demographic segments or potential interests or behaviours. These advertisements may be displayed to you on various channels, including our Website or app (as part of on- and in-app marketing), as well as advertising placements provided through the online advertising networks we use, such as Google.

The data may then be analysed for the purpose of settlement with the service provider, as well as for evaluating the effectiveness of advertising measures in order to better understand the needs of our users and customers and to improve future campaigns. This may also include information that the performance of an action (e.g., visiting certain sections of our Website or submitting information) can be attributed to a specific advertising. We also receive from service providers aggregated reports of advertisement activity and information on how users interact with our Website and advertisements.

You can withdraw your consent at any time by rejecting or deactivating the relevant cookies in the settings of your web browser (see section 6.2). Further options for blocking advertising can also be found in the information provided by the respective service provider.

### 6.5.2 LinkedIn Ads

Our website uses the visitor action pixel and the related retargeting (**LinkedIn Ads**) features of LinkedIn, LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA, or if you are based in the EU, LinkedIn Ireland, Wilton Plaza, Wilton Place, Dublin 2, Ireland (**LinkedIn**) for conversion measurement.

These tools allow us to track your behaviour after you have been redirected to the provider's website by clicking on a LinkedIn ad. This allows us to evaluate the effectiveness of LinkedIn ads for statistical and market research purposes and to optimise future advertising measures. In addition, this technology can be also used to show you personalized advertisements on LinkedIn. Furthermore, it also enables the creation of anonymous reports on the performance of the ads, as well as information on website interaction.

The collected data is anonymous to us as the operator of this Website, we are unable to infer the identities of the users. However, the data is stored and processed by LinkedIn, so that a connection to the respective user profile is possible and LinkedIn may use the data for its own advertising purposes, in accordance with the LinkedIn privacy policy. This allows LinkedIn to enable the placement of ads on LinkedIn pages as well as outside of LinkedIn. We, as the Website operator, have no control over this use of data.

You can prevent the data processing by disabling the storage of cookies through the corresponding setting of your browser software (see section 6.2 above); however, we would like to point out that in this case, you may not be able to use all the functions of our Website to their full extent. You can also deactivate data collection in the account settings at <https://www.linkedin.com/psettings/advertising>. To do this, you must be logged into LinkedIn.

Further information and LinkedIn's privacy policy can be found at: <https://www.linkedin.com/legal/privacy-policy>.

## 7. Retention periods

We only store personal data for as long as it is necessary to carry out the processing described in this privacy policy within the scope of our legitimate interests. For contractual data, the storage is stipulated by statutory retention obligations. Requirements that oblige us to retain data arise from the accounting and tax law regulations. According to these regulations, business communication, concluded contracts, and accounting documents must be retained for up to 10 years. If we no longer need this data to provide services for you, the data will be blocked. This means that the data may then only be used if this is necessary to fulfil the retention obligations or to defend and enforce our legal interests. The data will be deleted as soon as there is no longer any legal obligation to retain it and no legitimate interest in its retention exists.

## 8. Data security

We use appropriate technical and organisational security measures to protect your personal data stored with us against loss and unlawful processing, in particular unauthorised access by third parties. Our employees and the service companies mandated by us are obliged to maintain confidentiality and uphold data protection. Furthermore, these persons are only granted access to personal data to the extent necessary for the performance of their tasks.

Our security measures are continuously adapted in line with technological developments. However, the transmission of information via the Internet and electronic means of communication always involves certain security risks and we cannot, therefore, provide any absolute guarantee for the security of information transmitted in this way.

## 9. Your rights

If the legal requirements are met, as a data subject, you have the following rights with respect to data processing:

**Right of access:** You have the right to request access to your personal data stored by us at any time and free of charge if we process such data. This gives you the opportunity to check what personal data concerning you we process and whether we process it in accordance with applicable data protection regulations.

**Right to rectification:** You have the right to have inaccurate or incomplete personal data rectified and to be informed about the rectification. In this case, we will also inform the recipients of the data concerned about the adaptations we have made, unless this is impossible or involves disproportionate effort.

**Right to erasure:** You have the right to obtain the erasure of your personal data under certain circumstances. In individual cases, particularly in the case of statutory retention obligations, the right to erasure may be excluded. In this case, the erasure may be replaced by a blocking of the data if the requirements are met.

**Right to restriction of processing:** You have the right to request that the processing of your personal data be restricted.

**Right to data portability:** You have the right to receive from us, free of charge, the personal data you have provided to us in a readable format.

**Right to object:** You have the right to object at any time to data processing, especially with regard to data processing related to direct marketing (e.g., marketing e-mails).

**Right to withdraw consent:** You have the right to withdraw your consent at any time. However, processing activities based on your consent in the past will not become unlawful due to your withdrawal.

To exercise these rights, please send us an e-mail to the following address:  
hallo@simplee-energy.ch.

**Right of complaint:** You have the right to lodge a complaint with a competent supervisory authority, e.g., against the manner in which your personal data is processed.

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