

# Data protection declaration of SMA Solar Technology AG for the use of SMA digital services



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# 1 Introduction

## 1.1 General information

We, SMA Solar Technology AG, Sonnenallee 1, 34266 Niestetal, are the operator of the online service belonging to the party responsible for processing the personal data of the users of the online service. You can find our contact details in the publication information of the online service and the contact persons for questions concerning the processing of personal data are named directly in this data protection declaration.

We take protecting your privacy and private information very seriously. We gather, store and use your personal data only in line with the content of this data protection declaration and the applicable data protection provisions, particularly the European General Data Protection Regulation (GDPR) and national data protection provisions. We want to uphold the trust you place in us in this regard as well. For this reason, we protect your personal data in particular from access by unauthorized persons.

With this data protection declaration, we want to inform you of in which scope and for which purpose personal data is processed in connection with use of the online service.

You can find out more about the tools and cookies we use on the website and customize your cookie settings by selecting "Cookie settings." Note that depending on your settings, you may not be able to use all the functions of the website.

## 1.2 Personal Data

Personal data is information about an identified or identifiable individual. This includes all information about your identity, such as your name, your e-mail address or your address. In contrast, information that cannot be connected to your identity (e.g., statistical information, such as the number of online service users) is not considered personal information.

Our online service can be used only for a few services (e.g., the solar calculator) without disclosing your identity and without providing personal data. Only general information about your visit to our online services will then be collected. However, personal data will be collected from you for the use of many of the services offered. This information will then be processed by us only for the purpose of using this online service, especially for providing the desired information. When collecting personal data, it is mandatory that only the data needed is given. Furthermore, additional information can be provided on a voluntary basis. We will indicate whether it is a mandatory field or optional details. We provide specific details on this in the corresponding section of this data protection declaration. Automated decision-making based on your personal data is not applied to the use of our online service.

## 1.3 Processing Personal Information

We store your information on specially secured servers within the European Union. Technical and organizational measures protect these against loss, destruction, access, alteration or dissemination of your data by unauthorized persons. Only a few authorized persons are able to access your data. These individuals are responsible for the technical, commercial and editorial supervision of the server. Despite regular inspections, complete protection against all risks is not possible, however.

Your personal data will be encrypted when sent over the internet. For data transmission, we use an SSL encryption (Secure Sockets Layer).

## 1.4 Sharing Personal Data with Third Parties

We generally use your personal information only to carry out the services desired by you. Insofar as we use external service providers to carry out these services, their access to the data will be exclusively for the purpose of this task. Using technical and organizational measures, we ensure compliance with data protection standards and also commit our external service providers to them.

Furthermore, we do not pass on data to third parties without your express permission, especially not for promotional purposes. Your personal data is passed on only if you have consented to it or insofar as we are authorized or obligated to do so due to legal provisions and/or official or judicial instructions. In particular, this may concern giving information for the purpose of criminal prosecution, for hazard prevention or to enforce intellectual property rights.

## **1.5 Legal Basis for Data Processing**

Insofar as we receive consent to process your personal data, Article 6 (1) letter a of the GDPR serves as the legal basis for data processing.

Insofar as your personal data is processed because it is required to fulfil a contract or as part of a contract-like relationship with you, Article 6 (1) letter b of the GDPR serves as the legal basis for data processing.

Insofar as we process your personal data to fulfil a legal obligation, Article 6 (1) letter c of the GDPR serves as the legal basis for data processing.

As a legal basis for data processing, Article 6 (1) f) GDPR is taken into further consideration if the processing of your personal data is required to protect a legitimate interest of our company or a third party and your interests, basic rights and freedoms do not require personal data to be protected.

In line with this data protection declaration, we always indicate on which legal basis we support the processing of your personal data.

## **1.6 Deleting Data and Storage Duration**

As a rule, we then always delete or block your personal data when the purpose of the storage is eliminated. However, storage may also take place if this is designated by legal provisions to which we are subject, for example in terms of legal storage and documentation obligations. In a case such as this, we delete or block your personal data after the end of the relevant specifications.

## **2 Using Our Online Service**

### **2.1 General information**

Our online offering consists of several specific services, such as the Online Service Center, the 360° App, the Sunny Portal, and our Sunny Design. In 2.2, we present the specific provisions for each offering. These are followed by the general provisions in 2.3, particularly the provisions for what are known as cookies.

### **2.2 Offer-Specific Provisions for the Use of the Online Offer**

#### **2.2.1 General information**

Nearly all services require that you have set up an account.

#### **2.2.2 Customer accounts**

We differentiate between customer accounts for private persons and accounts for companies. You can manage the data for an account yourself and delete it if desired.

To create an account for a private person, the name, contact data, and a password must be entered. If you want to be informed regularly about new developments from our company, you can save this setting as well. Private persons are typically owners of a photovoltaic system. Once the basic data has been entered, we will send you an email with the data you provided and request that you check the data and confirm its accuracy to us. The private account is then active.

For a company account, generally the same data is required as for an account for a private person. In addition, we need your sales tax ID and commercial registry number. To simplify data collection, we access a database of company data and prefill the input fields with suggestions from this company database. A company account may be for a system owner, installer, or other interested party. The company account is reviewed by SMA before use and is approved in a separate step.

Any number of employees may be registered to a company account. The name, contact data, and password must be entered to do so. In addition, the company may assign individual employees the role of administrator for the company account. The administrator can manage all of the company's data and delete it if desired. Employees can only manage and delete their own data.

The legal basis for creating a customer account is the fulfillment of a contract, for example for provision of goods and services; preventive maintenance; or provision of data for a photovoltaic system (energy production and consumption) under Article 6(1)(b) GDPR, and our legitimate interest in the design of the ordering process, maintenance, service cases, and data provision under Article 6(1)(f) GDPR.

## **2.2.3 Online Service Center (OSC)**

### **2.2.3.1 General information**

We bundle all of our offerings for repairs and maintenance of a photovoltaic system in our SMA service portal, the Online Service Center (OSC). The use of the OSC generally requires a customer account.

### **2.2.3.2 Contacting the OSC**

If you use the option to contact us, personal data will be collected and stored. The actual correspondence including the related personal data you provide will be stored accordingly. This data is used exclusively for the purpose of correspondence and for processing your case as needed. In addition, the data provided by you for this will be compared against our customer system. This system is provided to us by the vendor Salesforce (Pardot). You will find the required information about this in this data protection declaration under 2.3. This comparison takes place in order to improve the service by retrieving previous service history, the system data, etc. We are therefore able to process your inquiries more quickly, more conveniently, and in a more targeted manner.

After completion of the correspondence, the personal data and content of the correspondence will be stored in our customer system for documentation purposes, in order to ensure a consistent service practice in the event of any questions or similar cases. Of course, the personal data obtained in this regard will not be shared with unauthorized third parties.

The processing is carried out in your interest and with your consent as well as in the interest of our company in properly handling the correspondence as well as your service order (Article 6 (1) a), b) and f) GDPR).

### **2.2.3.3 Registration in the OSC**

The Service Portal provides a comprehensive range of services. Please see the SMA Online Service Center (OSC) general terms of use for details. <https://files.sma.de/assets/274957.pdf> Registration is not required for SMA customers. Use of the portal is exclusively voluntary or in connection with the use of services.

If you make use of our services, a service ticket will be created in our online system for you, which you can manage and use by registering. Otherwise the ticket will be maintained by service employees only. Your data will be limited to the necessary extent if the ticket is created by service employees. In the interests of data economy, only data that is necessary for the performance of our services is collected (Article 6 (1) letter b GDPR). Only data that must also be specified as part of registration is recorded and used. This data is linked to information about the service request(s) and service(s). The data is added to our customer management system provided by Salesforce.com. <https://www.salesforce.com/de/?ir=1>. Please refer to the information in 2.3. Should an economic process occur in connection with the service request (repair, delivery, warranty, etc.), the customer data will be forwarded to SAP SE in Walldorf. There is a contract processing

agreement with SAP (Article 28 GDPR). A data transfer abroad takes place only insofar as it is necessary to provide the service (e.g., SMA system locations outside the EU). In addition, we conduct extensive research on the systems used by SAP (SAP ERP). We continuously inform ourselves about data-related weaknesses or inadequacies of the system and evaluate the use if necessary.

The data records are deleted when the service has been provided, insofar as the storage is not required for documentation and service purposes or legal reasons. In particular, we retain data for 6 months in order to be able to help with follow-up questions about the service history quickly and competently. Only in this way we are able to provide service-related and effective advice. This is also in the interest of our customers (Article 6 (1) letter f GDPR).

#### **2.2.3.4 Information in addition to the customer account**

In addition to the information in the customer account, the following information may be requested:

- **Company und Commercial Owner:** This defines whether the account is a Sales, Service, Sunbelt or Other account.
- **Legal Type:** This involves the distinction of partner companies, private customers, public institutions, etc.
- **Service Classification:** This involves the distinction between a key account, service partner, installer, and end customer.
- **Sales District:** Details about the company code number for questions about the booking and for tax reasons.

The customer also has the option to register systems, which the system-related data is then collected from.

This information enables us to adapt the functions of our service and to help pre-select for the customer. Only this way is a customer-oriented approach possible. This data is therefore processed based on the consent and the interests in question on the basis of Article 6 (1) letters a and f GDPR.

#### **2.2.3.5 Processing in OSC**

The use of the SMA Service Portal (OSC) generally requires an existing customer account. If you have registered as an end customer, you are free to select any installer associated with us as the supervisor of your system. The aim is that the customer makes his address information available to his chosen installer(s) via the portal in order to have SMA Service deliver services to the customer address. If you decide to use this feature, you will be asked to consent to the following processing of your data when selecting the installer:

The installer receives the customer-related data that is stored in the Service Portal (OSC) account. The installer is hereby authorized to use the customer data for order purposes, e.g., as the delivery address for spare parts. This occurs only in the customer's interest. The processing of the data by the installer as well as the transfer to them by us is based on your consent according to Article 6 (1) letter a of the GDPR. In addition, processing is in the customer's interest (Article 6 (1) letter f of the GDPR).

#### **2.2.3.6 Registering the System**

If you want to use the product registration in our online offer, you need a mySMA user account. This product registration is a free service intended for private end users, but can also be used by an installer. Here we collect personal data, in particular the name and e-mail address, address of the system location, serial number, and the commissioning date of the device to be registered.

Depending on the registration date, equipment location and equipment type, registration can set the starting date of the factory warranty to the commissioning date and some equipment will receive a free extended factory warranty. Furthermore, registration allows you to use an activation code to add a fee-based SMA warranty extension to the registered product.

We store your system data for at least as long as the warranty period, but no longer than the end of your system's service life. Please inform us if the system is out of operation or if you wish to delete it. In such a case, we will delete or block your personal data.

## 2.2.4 Energy app

### 2.2.4.1 Categories of the data used here

For this online offering, we use the following categories of personal data:

- **Registration data:** In order to be able to use the functions in our app, a customer account must be created (see 2.2.2). If an account exists, you only need to enter your e-mail address or username as well as your password.
- **Energy data:** You can use the app to view your energy data relating to your PV system. This data is made available to you in the app from the SMA Sunny Portal. With regard to the processing of your energy data in SMA Sunny Portal, we would like to refer to the data protection information for registration in the SMA Sunny Portal (see 2.2.6). By using the app, no further energy data is processed.
- **Simulation data:** In our app, you can use the Energy Calculator to calculate whether it is recommendable for you to expand your PV system or to purchase a new one (Energy Calculator Report). For this purpose, you can enter or add data relevant for the utility value analysis (address, roof size and roof pitch, orientation of the roof, energy consumption). If the Energy Calculator has aroused your interest, you can directly request a non-binding offer for the expansion of your or the creation of a PV system. The contact data stored in the customer account will be used to contact you.
- **Server and application log data:** When you use the app and it connects to our servers to use various features, data about it, (e.g., the date and time of your visit, the functions called up, the type and operating system of the mobile device you are using, as well as your IP address) is temporarily stored in a log file. We can also create user profiles on this under a pseudonym. It is then not possible to deduce any direct information about you.

Providing these data is required to use the app, unless the provision is not expressly voluntary.

### 2.2.4.2 Data processing in this online offering

Your registration and energy data is used for the authorization and/or rendering of the services and for the administration of your customer account data. This is required for the provision of the app and is therefore based on Article 6(1)(b) GDPR (performance of a contract). This personal data is stored with us for the duration of the existence of your customer account and three months after.

We will process your location or the location of the system during the registration of a new system if you click this button and do not want to enter the address manually. When you click this button, we will determine your current location via GPS in order to quickly provide you with the address. Data about your location will be used only for the registration of the new system. We will exclusively determine the address (street, house number, city, geocoordinates) and no further location data. If the address was determined by you, only this data will continue to be stored.

The legal basis for processing your location data is your consent (Article 6(1), Letter a) GDPR). The data processed with your consent will be stored until you withdraw your consent (see 5.3). As soon as the specific address is determined and only the address data is stored, this processing is based on performing the duties contained in the contract (see 1.5). The address data will remain stored until the system is no longer registered with SMA.

## 2.2.5 360 degree app

### 2.2.5.1 Categories of the data used here

For this online offering, we use the following categories of personal data:

- **Registration data:** In order to be able to use the functions in our app, a customer account must be created as a company. If a company account exists, you only need to enter your e-mail address or username as well as your password.
- **Contact details:** You can register a customer's new system in the app.

- Location data: If you register a customer's new system in our app, you have the option to enter your address/the address of the system to be registered using your location. The location function of your mobile device is used to determine the address at which you are located. The determined address will then be stored in SMA Sunny Design, Salesforce, and Pardot.
- System planning: Using the app, you can use the customer's data to plan a new system. The customer data is then used by us to determine what benefits a new system would have for the customer. This can be sent to the customer upon request. Your personal data will not be processed by us.
- Server and application log data: When you use the app and it connects to our servers to use various features, data about it, (e.g., the date and time of your visit, the functions called up, the type and operating system of the mobile device you are using, as well as your IP address) is temporarily stored in a log file. We can also create user profiles on this under a pseudonym. It is then not possible to deduce any direct information about you.

Providing these data is required to use the app, unless the provision is not expressly voluntary.

### **2.2.5.2 Data processing in this online offering**

Your registration and energy data is used for the authorization and/or rendering of the services and for the administration of your company account data. This is required for the provision of the app and is therefore based on Article 6(1)(b) GDPR (performance of a contract). This personal data is stored with us for the duration of the existence of your account and three months after.

If you create a new system in our app, we will process your contact details in connection with the registered system, as we need your contact data as part of the subsequent monitoring services that we provide to the respective customer [and to you], so that we and the customer can contact you with questions, problems or requests in connection with the system. Processing your contact details is necessary in order to provide the contractual services. The legal basis for the processing is therefore the execution of precontractual measures and the initiation and, if necessary, conclusion of a contract, Article 6(1)(b) GDPR.

We will process your location or the location of the system during the registration of a new system if you click this button and do not want to enter the address manually. When you click this button, we will determine your current location via GPS in order to quickly provide you with the address. Data about your location will be used only for the registration of the new system. We will exclusively determine the address (street, house number, city, geocoordinates) and no further location data. If the address was determined by you, only this data will continue to be stored.

The legal basis for processing your location data is your consent (Article 6(1), Letter a) GDPR). The data processed with your consent will be stored until you withdraw your consent (see 5.3). As soon as the specific address is determined and only the address data is stored, this processing is based on performing the duties contained in the contract (see 1.5). The address data will remain stored until the system is no longer registered with SMA.

## **2.2.6 Sunny Portal**

### **2.2.6.1 Registration**

The use of the Sunny Portal and of Sunny Places requires that you have registered via a customer account (see 2.2.2). After you have logged in with your access data, you can in particular register energy technology devices, systems, and equipment (hereinafter referred to as "Equipment") pursuant to the respective terms of use. Registering Equipment allows you to conveniently monitor and visualize the Equipment's performance and yield. This also enables us to detect error patterns in your system at an early stage and take countermeasures as needed. This preventive maintenance is part of our Smart Connected service. If included in the online service, you can also interact with other registered users and share comments and other content in the forum provided by us.



### **2.2.6.2 Collection and use of equipment baseline data and performance data**

You can register one or more systems in the Sunny Portal. When a piece of equipment is registered, we collect and save the baseline data provided or transmitted (e.g. from Sunny Design) by you for the equipment ("Equipment Baseline Data"), e.g. equipment name, date of commissioning, location, PV system operator, and other technical details.

If a piece of equipment has been registered, we collect and save performance data for this Equipment ("Performance Data"), e.g. performance values for PV generation, grid-supplied power and grid feed-in, any battery charging and discharging, as well as electric currents, voltages, and other measured values for devices. Performance data must be collected in order to render the services we offer, especially to graphically display and statistically evaluate energy production and consumption by your Equipment and to report malfunctions.

Equipment Baseline Data and Performance Data must be processed in order to fulfill the contract of use concluded with you pursuant to the particular contractual provisions that apply. The legal basis for processing is Article 6 (1b) GDPR.

Aside from providing the services offered as part of our online services, we also use the Performance Data to draw up statistics, evaluations, and prognoses. However, we forward this data to grid operators in an anonymous display format and also depict it in publicly accessible maps. The legal basis for this processing is Article 6 (1f) GDPR (legitimate interests).

### **2.2.6.3 Collection and Use of Grid Status Data**

We also collect and save general technical data for the utility grid status at the point of interconnection of registered equipment, referred to as Grid Status Data. The point of interconnection is typically at or near the location of the Equipment. For private households, the connection box is the point of interconnection. For instance, we collect and save the following Grid Status Data: voltage, phase angle, frequency, and impedance. This data is not dependent on individual use of the utility grid and does not allow any inferences to be drawn about the usage of the Equipment, the power consumption, the amount of electric current produced by the Equipment, or other personal circumstances.

We collect and save Grid Status Data in order to support cost-effective grid expansion in the interest of the national economy and to promote the expansion of renewable energy and the integration of increasing e-mobility. To this end, we provide the Grid Status Data to some grid operators and other public utility service providers. When transferred, the Grid Status Data is forwarded citing the address of the Equipment. The address must be cited in order to locate the point of interconnection. No other information is sent. We transfer these records only to grid operators and public utility service providers that operate the utility grid at the corresponding location. The grid operators have considerable interest in the Grid Status Data since they need it for maintenance and for efficient expansion of the utility grid.

The legal basis for this processing is Article 6 (1f) GDPR (legitimate interest). We and the grid operators or the public utility service providers have a legitimate interest in using the Grid Status Data for the purposes stated above.

### **2.2.6.4 Preventative maintenance in the "Smart Connected" service**

If you decide to use our "Smart Connected" service, then the operating condition of your PV system will be monitored using the system data transmitted to SMA. If, in the course of monitoring, a deviation from the normal state that is classified by SMA as a device error is detected, then SMA will take measures in accordance with the factory warranty or the extended warranty you have purchased in order to correct the device defect. This may mean replacing devices, remote maintenance of your system, or on-site service by qualified personnel, for example. It may also be necessary to exchange data with our service partners (installers) for this purpose.

The legal basis for processing this data is Article 6 (1)(b) (performance of a contract).

## 2.2.6.5 Approved Data Transfers

As a registered user, you can approve the transfer of Equipment Data to third parties that you specify. To do so, you must specify in the log-in area which Equipment is approved and to whom the data will be transferred. Once approved, we will allow the third party to access Equipment Data. The third party will thus obtain the Equipment Baseline Data and Performance Data that they access regarding the approved equipment (for content on Equipment Baseline Data and Performance Data, see section "Sign-Up for Our Online Services"). To clarify, the login credentials for the user account will not be forwarded under any circumstances.

Under this approval, data may be transferred to third parties based in a country outside the European Economic Area (EEA). These countries may not have an adequate level of data protection. In such cases, we do not take any precautions to ensure an adequate level of data protection.

You can prohibit the transfer of data at any time by disabling the approval.

The legal basis for processing this data is Article 6 (1b) (performance of a contract). Use of the approval function falls under the services we offer pursuant to the applicable contractual terms. The legal basis for transfer to a third party in a third country without an adequate level of protection and without suitable safeguards for compliance with the provisions of GDPR is Article 49 (1b) GDPR (performance of a contract).

## 2.2.6.6 Data Transfer to SolarCoin

We offer you as a registered user a simple option to register Equipment with the SolarCoin Foundation in order to receive SolarCoin cryptocurrency. To do so, you can approve Equipment for participation in the SolarCoin program in the log-in area. If you grant this approval, we transfer your first and last names, your e-mail address, and the city/town, postcode, street, number, country, commissioning date, and nominal PV system power of the registered Equipment to the two parties involved in the process in order to register the piece(s) of Equipment: SolarCoin Foundation (28 River Valley Road #4245, Greenwich, CT 06831, USA) and SolarLux (2301, 23/F., Bayfield Building, 99 Hennessy Road, Wanchai, Hong Kong). Solarlux is the technical service provider for the SolarCoin Foundation. Through this registration, a contract of use for the use of the SolarCoin program is established between you and the SolarCoin Foundation.

After registration, the SolarCoin Foundation will send a query to the system's energy meter at regular intervals to determine how many SolarCoins (or fractions thereof) should be posted to the user's SolarCoin wallet. All SolarCoin transactions are recorded in the SolarCoin blockchain, which SMA is unable to access.

As part of the registration for SolarCoin and participation in the SolarCoin program, personal data is transferred to a third party (Solar Coin Foundation) based in a country outside the EEA, namely in the US and China (Hong Kong). No level of data protection equivalent to the level of data protection in the EU exists in the US and China. We have not taken any precautions to ensure a level of data protection that broadly meets the requirements of GDPR, and have not concluded any EU standard contractual clauses in particular.

The legal basis for processing this data is Article 6 (1b) (performance of a contract). Registration with SolarCoin falls under the services we offer pursuant to the applicable contractual terms. The legal basis for transfer to a third party in a third country without an adequate level of protection and without suitable safeguards for compliance with the provisions of GDPR is Article 49 (1b) GDPR (performance of a contract).

## 2.2.7 Sunny Design

### 2.2.7.1 General information

You can use Sunny Design to create a draft for a PV system. In addition to your customer account data, we will need the following information for this purpose: project name, system location (address, geocoordinates), grid connection, project number, customer, comment, system images, temperature settings, load profiles, details on special loads, PV modules, their number, orientation and mounting method, type and number of inverters, battery systems, gensets, details on e-mobility, thermal energy and profitability calculations.

If project-related data in Sunny Design is shared with third parties for the purpose of automated system design or system simulation, this is carried out completely anonymously. This particularly applies to the simulation of energy systems with Polysun Inside software from Vela Solaris AG.

The legal basis for processing this data is Article 6 (1b) (performance of a contract).

## **2.2.8 Webshops**

### **2.2.8.1 General information**

Our webshop is geared towards corporate customers such as installers, distributors, etc. It requires the creation of a company account for use (see 2.2.2).

We use the personal information (such as name, email address, address, payment data) available in the customer account for the purpose of ordering goods in order to implement and process the order. This information is kept confidential and not forwarded to third parties who are not involved in the ordering, delivery, or payment process. The legal basis for this processing is the initiation of a contract conclusion at the request of the customer and the conclusion and performance of a contract with the customer in accordance with Article 6 (1) b) of the GDPR.

The payments by way of credit card payment or other payment methods (including bank transfers, if indicated) are processed by Stripe Payments Europe Limited, 1 Grand Canal Street Lower, Grand Canal Dock, Dublin, D02 H210, Ireland, or by associated companies. In addition to pure payment processing, Stripe also performs a credit check. In order to prevent and uncover fraud, we transmit your IP address and other data relating to your device (e.g., type of device, browser version) to Stripe along with the data required for payment processing and the credit check. This data is then saved by Stripe. All data is encrypted for transmission. We reserve the right to engage additional payment service providers.

## **2.2.9 SMA website**

### **2.2.9.1 General information**

On our website, we provide information about our products, the company, events, and application examples. In addition, a solar calculator can be used to create an example calculation for private solar projects, and we also provide information for our investors.

### **2.2.9.2 Solar Calculator**

The solar calculator is a free service aimed at private end consumers. You can use the solar calculator to create a non-binding sample calculation ("solar potential") and then send a request for quotation to SMA. SMA forwards the request to selected, qualified specialist trade companies in your area. The companies will then contact you directly for further consultation and quotations.

To calculate the solar potential, it is necessary to make certain entries in the solar calculator (such as the planned location of the PV system). Furthermore, we record your personal data if you send a quotation request.

Below, you will find information about what data is recorded and stored and how it is used when you submit your quotation request:

- Contact data: title, first name, last name, street, house number, ZIP code, city, country, telephone number, e-mail address, telephone number
- Data on structural requirements: planned location of the PV system, roof type, roof area, roof pitch, roof orientation
- Additional data: annual electricity consumption, number of persons in household, consumption profile, additional appliances, preferred battery-storage systems yes/no, date of planned installation, other comments

- Calculated results from the solar calculator: calculated energy demand, calculated size of the PV system, calculated self-consumption, calculated residual power consumption, calculated grid feed-in, calculated savings in electricity costs, calculated degree of independence/self-sufficiency, calculated CO2 savings, product recommendation

The legal basis for the processing of your data is the initiation of a contract in accordance with Article 6 (1) letter b of the GDPR. SMA will forward your data to qualified installers (SMA Solar specialist partners) for the preparation of a quotation. Your data will be exclusively used by SMA Solar specialist partners for the preparation of quotations. Please understand that we have no influence on the business relationships between you and the specialist partner.

Any personal data that SMA collects about you will be treated as strictly confidential and will not be passed on to third parties without your express consent. SMA may use personal data for internal purposes (e.g., for data analysis, research or to improve its products). Your data will be deleted from our system at the latest after three months from the time of your request in the solar calculator.

For the processing of your quotation request and for sending e-mails, your data will also be processed in the U.S. We send this data to the company Salesforce.com EMEA Limited (Salesforce), village 9, floor 26 Salesforce Tower, 110 Bishopsgate, London, UK, EC2N 4AY. This way, in cooperation with the company Salesforce.com, we are better able to process the quotation request according to your specific needs. We believe that this is in your best interest.

For the automated sending of e-mails, we use the Salesforce Pardot automation software of the eponymous company Salesforce.com EMEA Limited (Salesforce). Pardot records your user behavior and evaluates your data in the form of a user profile. For more information, see 4.3.

### **2.2.9.3 Information for our investors**

Stock prices and other company data are available on our website, and we also offer an Investor Relations Newsletter (referred to hereinafter as the "IR Newsletter").

To do so, we incorporate external services of EQS Group AG (EQS Group AG, Karlstrasse 47, 80333 Munich) for visual presentation of our stock chart. If you use a service such as this, or if you are shown third-party content, communication data will be exchanged between you and the respective provider for technical reasons.

Therefore, please refer to the privacy policy of EQS Group AG at [germany.eqs.com/de/legal](http://germany.eqs.com/de/legal) for more information on the purpose and scope of collection and processing of your information.

Our use of this program constitutes a legitimate interest in data processing under Art. 6 (1) letter f of the GDPR.

We use the services of EQS Group AG to distribute our IR newsletter. Distribution on our behalf takes place on the basis of a processing agreement in accordance with Art. 28 (3) sentence 1 of the GDPR. We provide the head of distribution with your information exclusively for the purpose of sending the e-mail.

Subscriptions to our IR Newsletter are performed using a process called double opt-in. That means, after you sign up, you will receive an e-mail asking you to confirm your subscription. This confirmation is necessary so that no one can subscribe using e-mail addresses that do not belong to them. A record is kept of subscriptions to the IR Newsletter so that we can show proof of the subscription process as required by law. This includes storing the times at which the subscription and the confirmation were received as well as the IP address. We also record any changes in your information stored by the head of distribution.

To allow us to process your information, we obtain your consent during the subscription process and refer you to this Privacy Policy (Art. 6 (1) letter a of the GDPR).

Your information is used exclusively for the purpose of mailing the IR Newsletter.

## 2.3 General Regulations for the Use of the Online Offer

### 2.3.1 Information about Your Device

Each time our online service is accessed, we gather the following information about your device independently of your registration: the IP address of your device, the web browser request and the time of the request. In addition, the status and the data volume transferred will be collected as part of this request. We also collect product and version information about the web browser used and the device's operating system. Furthermore, we gather from which website the online service was accessed. The IP address of your device is stored only for the time that the online service is used and is deleted afterward or anonymized by abbreviating it. The other data is stored for an unlimited amount of time.

We use this data to operate the online service, particularly to identify and remedy errors in order to determine the utilization of the online service and make adjustments or improvements. For the technically necessary cases, as our justifiable interest in data processing in accordance with Article 6 (1) letter f of the GDPR, these purposes are also the legal basis for this processing. For all other cases, your approval – if granted – is the legal basis for this processing (Article 6 (1)(a) GDPR).

### 2.3.2 Using Cookies

#### 2.3.2.1 General information

Cookies are used on our online service, like with many websites. Cookies are small text files that are sent from our web servers to your web browser when you access our online shop and are kept on your computer for later access. A cookie usually contains the name of the domain from which the cookie file was sent, information about the age of the cookie, and an alphanumeric identifier.

Cookies enable us to recognize your device and provide possible default settings immediately. Cookies help us improve the online service and provide you with a better service that is even more tailored to you. In this, we also observe our justifiable interest in data processing in accordance with Article 6 (1) letter f of the GDPR. For cookies that exceed the technically necessary level, we ask you to consent to processing by acknowledging the cookie banner. If you do not grant this permission, we will not use any cookies. If you give consent, this provides the legal basis of our processing (Article 6 (1) letter a GDPR).

The cookies used by us are known as session cookies, which are automatically deleted at the end of the web browser session. We also use cookies that are stored for longer periods, meaning that your default settings and preferences can also be incorporated during your next visit to our online service.

Most web browsers are set up so that they automatically accept cookies. However, you can deactivate cookie storage or set up your web browser so that it notifies you as soon as cookies are sent. It is also possible to delete already stored cookies manually using the web browser settings. Please note that you may be able to use only a restricted version of our online service or not use it at all if you reject the storage of cookies or delete the necessary cookies.

#### 2.3.2.2 Use of Technically Necessary Cookies

Some cookies are necessary for technical reasons to enable the use of our online service. With these cookies, we gather and store the following data:

- Language settings
- Search settings
- Information to identify or authenticate the user
- Data for smooth forwarding of audio or video content

Cookies enable us to recognize your computer and make possible default settings available. Cookies help us to improve the online service and be able to provide you with a better and more user-friendly service. Using cookies is also required to simplify the use of our online service. Some functions can be provided only by using cookies. This concerns the search function, language settings and similar. From this follows our justifiable interest for the legal basis for processing data by means of cookies in accordance with Article 6 (1) letter f of the GDPR.

### **2.3.2.3 Use of analysis cookies**

Furthermore, we use cookies on our website, making it possible to analyze your user behavior, which is known as a cookie analysis. With these cookies, we gather and store the following data:

- Frequency of page views
- Search terms
- Use of website functions
- Duration of visit

Your data, collected using cookies, is pseudonymized so that it is no longer possible to assign data to a respective user if they have not clearly and actively given their consent.

We use cookie analysis to improve and optimize the quality of our online service and its content and to also review and improve the range and retrievability of our online service. We use cookie analysis with your consent. The legal basis of this processing is Article 6 (1) letter a of the GDPR.

You can prevent cookies from being stored on your computer by using the relevant setting in your browser software. However, please note that in this case you may not be able to use all functions of this website. You can also prevent the collection of the data generated by the cookie and related to your use of the website (including your IP address) and the processing of this data by not authorizing the use of cookies in the cookie banner / privacy preference center.

To analyze user behavior for the aforementioned purposes, we use the software called Google Analytics as well as the software Adobe Analytics, which itself employs cookies as explained.

### **2.3.2.4 Analysis cookies from Google**

We use Google Analytics and Google Firebase for statistical evaluations. These are web analytics services from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94034, U.S. ("Google"). Google Analytics and Google Firebase use "cookies," which are text files saved on your computer to help the website analyze how users use the site. The information generated by these cookies about your use of the website will generally be transmitted to and saved on a Google server in the United States. In the event that IP anonymization is activated on this website, however, your IP address will be abbreviated in advance by Google within the member states of the European Union or in other countries that are members of the European Economic Area agreement. Only in exceptional cases will the full IP address be sent to a Google server in the U.S. and abbreviated there. Google uses the advertising ID of your device in its apps.

On behalf of the operator of this website, Google will use the information to evaluate your use of the website and the apps, to collect reports on the activities, and to perform other services related to the website and app use and internet use for the app/website operator. The IP address sent by your browser for Google Analytics will not be combined with other data owned by Google.

For more information, see <http://tools.google.com/dlpage/gaoptout?hl=de> or <http://www.google.com/intl/de/analytics/privacyoverview.html> (general information about Google Analytics and data protection) or <https://firebase.google.com/terms/data-processing-terms> (Google Firebase). Please note that on our websites Google Analytics includes the code "anonymizeIp();" to anonymize IP addresses by deleting the last byte.

### **2.3.2.5 Analysis Cookies from Adobe Analytics**

We also continue to use Adobe Analytics for statistical evaluations. Adobe Analytics is a web analytics service from Adobe Systems Software Ireland Limited, 4-6 Riverwalk, City West Business Campus, Dublin 24, Republic of Ireland ("Adobe"). Adobe Analytics uses "cookies," which are text files saved on your computer to help the website analyze how users use the site. The information generated by these cookies about your use of the website will generally be transmitted to and saved by Adobe in the United States.

More information can be found at [www.adobe.com/de/privacy.html](http://www.adobe.com/de/privacy.html) (general information on Adobe Analytics and data protection).

### **2.3.2.6 Use of Advertising Cookies (Salesforce Pardot Services)**

We store only and exclusively the personal data belonging to website users that have registered voluntarily / on their own initiative on our websites in order to receive information on products and services, because they want to subscribe to the SMA Newsletter or download documents. If they have given their consent, they can also receive promotional e-mails that are relevant to their interests.

Some forms on the websites are linked to Pardot. Pardot is marketing automation software by Salesforce.com EMEA Limited (Salesforce), village 9, floor 26 Salesforce Tower, 110 Bishopsgate, London, UK, EC2N 4AY.

Personal data provided voluntarily is initially stored in Pardot to then be processed using the Salesforce CRM system for the purpose of contacting and/or sending you information. Salesforce does not store any IP addresses but uses the individual assignment references "unique visitor ID" and "unique identifier." Deriving personal information is not possible.

You can learn about how Salesforce processes your information when visiting websites here: [https://help.salesforce.com/articleView?id=pardot\\_basics\\_cookies.htm&type=5](https://help.salesforce.com/articleView?id=pardot_basics_cookies.htm&type=5).

We use Pardot as a marketing analysis service that makes it possible to maintain, assess and expand our online service and marketing communication and optimize the content on our websites. Furthermore, to protect users and partners, fraud and security risks can be detected and parried, if necessary. Data will be processed in Salesforce on our behalf using cookies.

Pardot cookies are only used if you have also consented to this in the context of our cookie banner. You can also deactivate the storage of cookies in your web browser settings.

If you do not allow advertising cookies, it can lead to functions being restricted and to the online service being less user-friendly.

### **2.3.2.7 Use of Retargeting and Remarketing**

Retargeting and remarketing refer to technologies in which users who have visited a certain website are shown applicable advertisements also after leaving this website. For this, it is required that internet users recognize, beyond the company website, for what purpose the cookies of the corresponding service provider are used; the previous usage behavior is also taken into account. For example, if a user views certain products, these or similar products could then be shown later as advertisements on other websites. This concerns personalized advertisements that are adapted to the needs of the individual user. For these personalized advertisements, it is not necessary for the user to be identified beyond initial recognition. The data used for retargeting or remarketing is therefore not combined with further data.

We use these kinds of technologies to connect advertisements on the internet. We rely on third-party providers to connect advertisements. This includes an offer from Google, Facebook or LinkedIn that enables an automatic display for products that are interesting to the internet user. This function is implemented using cookies. For more information about this technology, see the Google Privacy Policy at <https://policies.google.com/privacy?hl=de>, the Facebook data protection declaration at <https://www.facebook.com/business/help/651294705016616>, or the LinkedIn data protection declaration at [.linkedin.com/legal/privacy-policy#choices-oblig](https://www.linkedin.com/legal/privacy-policy#choices-oblig). We will set cookies in accordance with your consent in the cookie banner. The legal basis for this is therefore Article 6 (1) letter a of the GDPR. The installation of cookies for

Google remarketing and Google AdWords conversion tracking can be prevented by a setting on the respective web browser software by calling up the website [://www.google.com/policies/privacy/ads/](http://www.google.com/policies/privacy/ads/) and changing the corresponding setting. Analogous functions are also offered by Facebook at <https://www.facebook.com/settings?tab=ads> and LinkedIn at <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

### **2.3.2.8 Use of Affiliate Tracking Cookies (Awin)**

We have integrated components of Awin of Awin AG, Eichhornstraße 3, 10785 Berlin, Germany on our website. Awin is a German affiliate network that offers affiliate marketing. Affiliate marketing is an Internet-based form of distribution that enables commercial operators of websites, known as merchants or advertisers, to display advertisements, which are usually remunerated by means of click or sale commissions, on third-party websites, i.e., on the websites of distribution partners, also known as affiliates or publishers. Awin sets a cookie on the information technology system of the data subject. The tracking cookie from Awin does not store any personal data. Only the identification number of the affiliate, i.e. the partner referring the potential customer, as well as the order number of the visitor to a website and the advertising material clicked on are stored. The purpose of storing this data is to process commission payments between a merchant and the affiliate, which are processed via the affiliate network, i.e. Awin.

Awin's applicable privacy policy can be found at <https://www.awin.com/de/rechtliches/privacy-policy-DACH>.

### **2.3.2.9 Use of Hotjar**

In addition to the cookies from Google Analytics described above, we also use cookies from Hotjar Ltd, Level 2, St. Julians Business Centre, 3, Elia Zammit Street, St Julians STJ 1000, in Malta. We use Hotjar cookies to understand the needs of our users and to optimize the experience on this website. By using Hotjar technology, we are better able to understand the experience of our users (e.g., how much time users spend on which page, what links they click, what they like or do not like, etc.), which helps us to align our offerings with the feedback from our users. Hotjar, like Google Analytics, uses cookies and other technologies to collect data about the behavior of our users and about their devices. Hotjar stores information on our behalf in a pseudonymized user profile on servers in the EU. Hotjar is prohibited by contract from selling the data collected on our behalf. More information about Hotjar can be found here: <https://help.hotjar.com/hc/de/sections/360007966773-Data-Privacy>

## **2.3.3 Use of local storage technology**

### **2.3.3.1 General information**

In addition to cookies, we also use what is known as local storage technology (also known as "local data" or "local memory"). Data is thereby saved locally in the cache of your web browser and remains present and able to be read there even after the web browser window has been closed or the program has terminated, unless you delete the cache.

Third parties cannot access the data saved in local storage. It is not forwarded to third parties and is not used for advertising purposes.

For this local data, we ask you to consent to processing by acknowledging the cookie banner. If you do not grant this permission, we will not use any local data. If you give consent, this provides the legal basis of our processing (Article 6 (1) letter a GDPR).

## **3 Involving Other Services**

### **3.1 Use of Google Maps**

Our online service contains an interface to the Google Maps service. This is a service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94034, USA ("Google").



To enable you to use the functions of Google Maps, we need to store your IP address. That information is generally transmitted to a Google server in the United States and stored there. We have no influence on this data transmission.

We use Google Maps to make it easier for you to locate the places named on our website. This constitutes a legitimate interest within the meaning of Article 6 (1) f) GDPR, which is also the legal basis regarding the use of Google Maps.

More information on the handling of user data can be found in Google's data protection declaration:

<https://policies.google.com/privacy?hl=en&gl=de>

## 3.2 Use of Eventbrite

On our website, we also give users the opportunity to register to attend events. For this purpose, we use the Eventbrite tool, which is operated by Eventbrite, Inc., 155 5th Street, Floor 7, San Francisco, CA 94103, USA ("Eventbrite"). If you register for an event, you will be redirected to Eventbrite's website. We have no influence on data processing by Eventbrite. To receive information on what information Eventbrite, Inc., collects, processes, and uses and for what purposes, follow this link:

<https://www.eventbrite.de/support/articles/de/Troubleshooting/Informationen-zum-EU-US-Datenschutzschild?lg=de>

To allow you to register for an event through Eventbrite, you will need to share the following information with Eventbrite, Inc.:

- Last name, first name
- E-mail address
- City
- Date of birth
- Ticket type
- Event ID (which webinar has been booked)
- Redeemed vouchers

You can find additional information on how Eventbrite, Inc., uses personal information in the Eventbrite privacy policy:

<https://www.eventbrite.de/support/articles/de/Troubleshooting/datenschutzrichtlinien-von-eventbrite?lg=de>

As the organizer, we receive from Eventbrite access to the information listed above on the individuals attending an event. We use the information for purposes of preparing for and following up on the event. To enable better planning of events we offer in the future, we use data on attendance at events to analyze how many people sign up for and are present at the events.

## 3.3 Use of YouTube

Our online service includes videos for the forwarding of which we use a plug-in belonging to YouTube ("YouTube"), which is operated by Google. The operator of this service is YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, U.S.A. If you call up a website of our online service that includes a video, this creates a connection to YouTube's servers. This communicates to YouTube's servers which websites of our online server you have visited.

If you are logged into your YouTube account, you enable YouTube to assign your surfing activity directly to your personal profile. You can prevent this by logging out of your YouTube account. More information on the handling of user data can be found in Google's data protection declaration at <https://www.google.de/intl/de/policies/privacy/>, which also applies to YouTube.

We use YouTube to show you videos and communicate more to you about us and our services; at the same time, this is a legitimate interest under Article 6 (1) (f) GDPR.

## 3.4 Use of Vimeo

Our online service includes videos for the forwarding of which we use a plug-in belonging to Vimeo ("Vimeo"), which is operated by Vimeo. The operator of this service is Vimeo, LLC, headquartered in 555 West 18th Street, New York, New York 10011. When you access pages on our website that have such a plugin, a connection to the Vimeo servers is created and the plugin is shown. This informs the Vimeo server which pages of our website you visited. If you are logged in as a Vimeo member, Vimeo assigns this information to your personal user account. When using the plugin, for instance by clicking the start button on a video, this information is also assigned to your user account. You can prevent this by logging out of your Vimeo user account before using our website and deleting the corresponding Vimeo cookies. For more information on data processing and data protection by Vimeo please go to <https://vimeo.com/privacy>.

We use Vimeo to show you videos and in this way communicate more to you about us and our services; this counts as a justifiable interest in terms of Article 6 (1) letter f of the GDPR.

## 3.5 Use of Google Web Fonts

This page uses web fonts provided by Google to ensure that fonts are rendered consistently. When you access a page, your browser loads the required web fonts to its cache in order to display the text and fonts correctly.

To do this, your browser has to connect to Google's servers. This tells Google that our website has been accessed from your IP address. Google web fonts are used to ensure that our website is displayed in a consistent, attractive fashion. This constitutes a legitimate interest as defined in Article 6 (1) (f) GDPR.

# 4 Communicating with Us

## 4.1 General information

There are a variety of ways to contact us, including via the contact form on our website. In addition, you can stay up to date with our newsletter by e-mail and via press releases.

## 4.2 Contact form

If you wish to use the contact form on our website, we will collect the personal data that you enter in the contact form, especially your name and e-mail address. We will also store your IP address as well as the date and time of the request. We process the data sent via the contact form only for the purpose of responding to your inquiries or concerns.

You can decide for yourself what information to send us in the contact form. The legal basis for processing your data is your consent in accordance with Article 6 (1) letter a of the GDPR.

After your concerns have been addressed, we will store your data temporarily in case we have any further questions. You can request that your data be deleted at any time; otherwise, it will be deleted after the matter has been addressed in full. This is without prejudice to legal retention obligations.

## 4.3 Newsletter

When you subscribe to our marketing newsletter, your e-mail address will be used for our own advertising purposes until you unsubscribe. You will receive regular information via e-mail on current topics and e-mails on special occasions, e.g., for special promotions or training offers. These e-mails may be personalized and tailored based on our information about you.

When you subscribe to our marketing newsletter, if you have not provided your consent in writing, we use what is known as the double opt-in process, which means that we will only send you a marketing newsletter by e-mail when you have expressly confirmed to us in advance that we should activate marketing newsletter delivery. We will then send you a notification e-mail and ask you to confirm that you want to receive our newsletter by clicking the link included in the e-mail.

The legal basis for processing your data is your consent in accordance with Article 6 (1) letter a of the GDPR if you have expressly subscribed to our marketing newsletter. In line with legal provisions, you may also receive our marketing newsletter from us without your express consent because you have ordered goods or services from us, we obtained your e-mail address in this context, and you did not object to receiving information by e-mail. In this case, the legal basis is our justifiable interest to communicate direct advertising to you in accordance with Article 6 (1) letter f of the GDPR.

We use the Salesforce Pardot marketing automation tool to distribute our marketing newsletter. Pardot is marketing automation software by Salesforce.com EMEA Limited (Salesforce), village 9, floor 26 Salesforce Tower, 110 Bishopsgate, London, UK, EC2N 4AY.

The personal data you share with us when subscribing to our marketing newsletter is also processed in the U.S. for the purposes of mailing the marketing newsletter and for marketing activities. We transmit that information to Salesforce.com EMEA Limited (Salesforce). We also use Salesforce Pardot software for the purposes stated above with regard to customer data. Thus, in cooperation with Salesforce.com we are better able to customize our communications by evaluating the specific interests of our customers. We believe that communications that specifically address our customers' interests also benefit the customers.

Please note that we will analyze your user behavior when we mail the marketing newsletter. For the purpose of this analysis, the emails that are sent contain web beacons or tracking pixels. For the analyses, we link the data transmitted via these tracking pixels with your e-mail address and a personalized ID. We use the information thus obtained to create a user profile so that we can tailor the marketing newsletter to your particular interests. We record when you read our marketing newsletters and which links you click on in order to infer your personal interests. We link this data to actions that you carry out on our website. If you do not want us to do this, you should cancel your subscription. Tracking of this nature will also not be possible if your email application default settings have disabled the display of images. In this case, you will not see the full content of the newsletter and may not be able to use all its features. If you display the images manually, the tracking referred to above will take place.

If you have subscribed to our marketing newsletter and we, as described above, analyze your user behavior, we will share the information collected in the process for marketing purposes with the companies named below, which are affiliated with us:

SMA Solar Technology AG, Sonnenallee 1, 34266 Niestetal, Germany

Tel.: +49 561 9522-0 / [www.SMA.de](http://www.SMA.de) / [Info@SMA.de](mailto:Info@SMA.de)

SMA Altenso GmbH, Sonnenallee 1, 34266 Niestetal, Germany

Tel.: +49 561 9522-0 / [www.sma-altenso.com](http://www.sma-altenso.com) / [sunbelt@sma.de](mailto:sunbelt@sma.de)

coneva GmbH, Dingolfingerstraße 15, 81673 München, Germany

Tel.: +49 561 9522-0 / [www.coneva.com](http://www.coneva.com) / [Info@coneva.com](mailto:Info@coneva.com)

SMA Solar Technology AG has a large number of subsidiaries around the world that market SMA AG products and perform the necessary service, such as SMA France S.A.S. or SMA Italia S.r.l. We share the data with these companies as well.

Your information is shared with these companies so we can put together in our newsletter the best possible offers for you - ones that you will find relevant and interesting. The companies named above will not use your personal information to contact you via other marketing channels (for example, phone calls). SMA Solar Technology AG has concluded agreements governing data processing on our behalf with these companies. Furthermore, because the data is shared only

if you expressly consented to the provisions of this data protection declaration, and thus to this sharing of your information, during the process of subscribing to the newsletter, processing will be based on Art. 6 (1) letter a of the GDPR. Furthermore, our customers also benefit from our sharing of the collected data with our affiliated companies so they can receive customized information in line with their interests. The data processing is therefore also based on a legitimate interest under Art. 6 (1) letter f of the GDPR. This is especially true since customers can cancel the newsletter at any time. The information will be stored for as long as you are subscribed to the newsletter. If you unsubscribe, we will store data anonymously and purely for statistical purposes.

If you no longer wish to receive marketing newsletters from us, you can withdraw your given consent at any time with effect for the future or object to the further receipt of e-mails without any additional expenses besides the basic rates of notifying us. Just use the unsubscribe link included in every newsletter or send a message to us or our data protection officer.

## 4.4 Comments

You have the option to comment on our articles in our online service. You need to provide your name but you can also use a pseudonym. In addition, you need to give your e-mail address. Specifying your e-mail address is required so that we can contact you if there are complaints about your comments and we can ask you for a statement on them; we also store the IP address. You cannot post comments without this information. However, when publishing a comment, only the name or pseudonym chosen by you will be shown. The legal basis for processing your data is your consent in accordance with Article 6 (1) letter a of the GDPR.

## 4.5 Social Media

In our online service, you can find hyperlinks to the social network Facebook, professional network LinkedIn and short message service Twitter. The hyperlinks can be recognized by the provider's respective logo.

Clicking on the links will open the corresponding social media pages, for which this data protection declaration does not apply. Please check the relevant privacy policies of the individual providers for details on the applicable terms and conditions; these can be found under:

Facebook: <http://www.facebook.com/policy.php>

LinkedIn: [https://www.linkedin.com/legal/privacy-policy?\\_l=de\\_DE](https://www.linkedin.com/legal/privacy-policy?_l=de_DE)

Before calling up the relevant hyperlinks, your personal information is not transferred to the respective provider. At the same time, your calling up the linked site is the legal basis for data processing by the relevant provider.

## 4.6 E-mail, letter or phone inquiry

If you contact us by e-mail, letter or phone, we will store and process your inquiry along with all the associated personal data (name, inquiry) for the purpose of responding to your inquiry. We will not share this data without your consent.

This data will be processed on the basis of Article 6 (1) (b) GDPR provided your inquiry is related to the performance of a contract or is required to take steps prior to entering into a contract. In all other cases, the processing is based on your consent (Article 6 (1) (a) GDPR) and/or our legitimate interests (Article 6 (1) (f) GDPR) since we have a legitimate interest in effectively responding to inquiries addressed to us.

We will retain the data that you send to us in your requests until you ask us to erase it, withdraw your consent to its storage or the purpose of the data processing no longer applies (e.g., after we have responded in full to your inquiry). Mandatory legal requirements - including, without limitation, statutory retention periods - still remain in full force and effect.

## **5 Your Rights and Contact**

### **5.1 General information**

We place strong emphasis on explaining the processing of personal data as transparently as possible and informing you of your rights. If you would like more detailed information or want to exercise your rights, you can contact us at any time so that we can address your concern.

### **5.2 Data Subject Rights**

With regard to processing your personal data, you are entitled to extensive rights. In addition, you have a comprehensive right to information and can demand the correction and/or deletion or blocking of your personal data, if applicable. You can also demand a restriction of the processing and have the right to cancel. With regard to the personal data you transferred to us, you also have the right to data portability.

If you want to claim your rights and/or receive more information about them, please contact our customer service. Alternatively, you can also contact our data protection officer.

### **5.3 Revoking Consent and Objection**

Any consent that you have provided can be withdrawn on request at any time with effect for the future. Withdrawing consent will not affect the lawfulness of the processing that was carried out between the time of consent and withdrawal. Both our customer service and our data protection officer are contact persons for this matter.

Insofar as processing your personal data is not based on consent but another legal basis, you can object to this data processing. Once you object, there will be a review and, if necessary, termination of data processing. You will be informed of the results of the review and receive – if the data processing is to continue nevertheless – detailed information from us about why data processing is permitted.

### **5.4 Data Protection Officer and Contact**

We have commissioned a data protection officer who provides us with support in issues relating to data protection and who you can contact directly. If you have questions about the collection, processing or use of your personal data that this data protection declaration has not answered, or want to request the correction or deletion of your data, or withdraw previous consent, please contact:

SMA Solar Technology AG

Data Protection Officer Sonnenallee 1

34266 Niestetal

E-mail: [datenschutz@SMA.de](mailto:datenschutz@SMA.de)

### **5.5 Complaints**

If you conclude that the processing of your personal data by us is not in line with this data protection declaration or the applicable data protection requirements, you can complain to our data protection officer. The data protection officer will then review the matter and inform you of the result of the review. Furthermore, you also have the right to complain to a supervisory authority:

Hessen Commissioner for Data Protection and Freedom of Information

Gustav-Stresemann-Ring 1

65189 Wiesbaden

Telephone: 0611-1408 0

E-mail: [poststelle@datenschutz.hessen.de](mailto:poststelle@datenschutz.hessen.de)

## **6 More Information and Changes**

### **6.1 Links to other websites**

Our online service may contain links to other websites. These hyperlinks are generally labeled as such. We have no influence on to what extent the linked websites comply with the applicable data protection regulations. Therefore, we recommend that you inform yourself of the relevant data protection declaration for other websites as well.

### **6.2 Changes to This Data Protection Declaration**

The version of this data protection declaration will be indicated by the date information (below). We reserve the right to change this data protection declaration anytime with effect for the future. A change occurs particularly with technical adjustments to the online service or changes to issues concerning data protection. The current version of the data protection declaration can always be accessed directly via the online service. We recommend that you regularly inform yourself of changes to this data protection declaration.

Version of this data protection declaration: April 2024