

Flower Bridge Privacy Policy



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General Counsel
CEO
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01.

Our Commitment

We, Flower Infrastructure Technologies AB, Reg. no. 559257-5558 ("we" or "Flower"), are committed to processing personal data in a lawful, fair, and transparent manner. We handle all personal data entrusted to us with a high level of care, integrity, and security, and always in accordance with applicable data protection laws.

02.

Introduction

This policy forms part of Flower's overarching data protection framework and complements our General Privacy Policy. It provides further details on how we collect, process, and protect personal data in connection with Flower Bridge and its associated services.

It applies to all private customers and users who interact with Flower Bridge's platform, digital solutions, or related services.

This policy explains:

- The legal bases we rely on to process personal data;
- How long we retain customer and user data; and
- How and why personal data may be shared with third parties.

03.

Purpose

The purpose of this policy is to outline:

- How we collect, use, and protect personal data within Flower Bridge and its associated services;
- The legal bases for processing personal data under the General Data Protection Regulation ("GDPR") and other applicable privacy laws; and
- The rights of individuals regarding their personal data.

04.

Personal data

Personal data refers to any information that can directly or indirectly identify a natural person.

Examples of personal data include names, addresses, phone numbers, and email addresses, but can also include information such as IP numbers or photos combined with other data if the information

can be connected to a natural person. Processing of personal data includes any operation which is performed on personal data, such as collection, recording, analysis, adaptation, storage or destruction.

Personal data processed by Flower is typically collected from you and, where necessary, also from third parties. Such third parties include mainly our partners which you already have, or will likely have, a customer relation with.

05. Your rights

In accordance with applicable data protection legislation, subject to some conditions and exceptions, you for example have the following rights:

- *Right to be informed:* You have the right to be informed about how we process your information. We do this through this Privacy Policy and by answering questions sent to us, which you submit by email to privacy@flower.se.
- *Right to access your data:* You may request a copy of your data by email to privacy@flower.se if you would like to know what personal data we process about you. This copy of your personal data can also be supplied in a machine-readable format.
- *Right to rectification:* You have the right to correct inaccurate or incomplete information about yourself which you can do by contacting us via email to privacy@flower.se.
- *Right to erasure:* You have the right to request deletion of your personal data, for example when it is no longer necessary for us to process the data for the purpose it was collected, or when you have withdrawn your consent, which you request by email to privacy@flower.se.
- *Right to restrict processing of your data:* If you believe your information is incorrect or you believe we use your data unlawfully, you have the right to ask us to stop or limit the processing, which you request by email to privacy@flower.se.
- *Right to lodge a complaint:* You have the right to lodge a complaint with your national supervisory data protection authority, the Swedish Authority for Privacy Protection (IMY) (<https://www.imy.se/privatperson/utfora-arenden/lamna-ett-klagomal>), or with the relevant EU/EEA data protection authority in your country of residence or place of work. If your concern relates to international data transfers, you may also refer your complaint to the European Data Protection Board (EDPB) or another appropriate international data protection body.
- *Right to opt out:* You have the right to opt out of the processing of your personal data for specific purposes by contacting us at privacy@flower.se.
- *Right not to be subject to any automated decision making:* Flower does not make decisions based solely on automated processing, including profiling, that produce legal effects or similarly significantly affect you.

We will respond to your request without undue delay and at the latest within 30 days of receipt. If your request is particularly complex, this period may be extended by up to two additional months, in

which case we will notify you of the delay and the reasons for it. Please note that Flower may be required by law to keep some personal data despite your request.

06.

Purpose of Processing Personal Data

This section outlines the purposes for which we process personal data, the corresponding legal bases under the GDPR and the categories of personal data involved in each case. The purposes may vary depending on the nature of your relationship with us. Below is a general description of the legal bases we rely on when processing personal data:

Contractual necessity: When processing is required to enter into or fulfil an agreement with you. This may include delivering a service, managing a business relationship or administering obligations under a contract.

Legitimate interest: When we, or a third party, have a legitimate and proportionate interest in processing personal data, provided it does not override your rights and freedoms. This can include improving security, managing operations or facilitating communication. If you wish to understand the specific legitimate interest for a particular processing activity see the listed processing activities further below. You are welcome to contact us if you have any questions.

Consent: When we ask for your clear and informed permission before processing your personal data for specific purposes. This applies, for example, to marketing communications or data collection beyond what is necessary.

Legal obligation: When we are required to process personal data to comply with applicable laws or regulations.

All personal data is processed in accordance with GDPR and other applicable data protection laws, ensuring that your information is handled lawfully, fairly, and transparently.

07.

Personal Data Processing for Flower Bridge and System Users

This section explains how Flower collects, processes, and protects personal data of users interacting with Flower Bridge's platform and services.

Purpose & Processing	Legal Basis	Categories of Personal Data
Connecting and optimizing the user's device (e.g. battery, inverter, heat pump, etc.) – linking the system to Flower's optimization platform to	Contractual Necessity Required to provide core functionality of the service.	Device identification number, battery performance data, power input/output data and IP address.

maximize energy efficiency and revenue.		
Processing transactions and payments – managing user compensation based on the available capacity towards Flower (kW) and monthly earnings.	Contractual Necessity Required for payout processing.	Transaction history and compensation calculations.
Ensuring system security and fraud prevention – monitoring device connectivity, detecting unauthorized access and preventing system manipulation.	Legitimate Interest Protecting system integrity and user security.	IP address, authentication logs, security event records and network connection logs.
Managing customer relationships – handling onboarding, communication and administration necessary to provide our services.	Contractual Necessity Fulfilling service commitments.	Name, postal address and email address.
Compliance with legal and regulatory obligations – meeting data retention laws, tax regulations or responding to legal requests from authorities.	Legal Obligation Required to comply with applicable laws.	Transaction history, tax information and other records required by law.
Monitoring and supporting technical service usage – collecting data to deliver, monitor and optimize technical aspects of our services.	Contractual Necessity and Legitimate Interest Necessary to deliver, improve, and secure the service.	Electricity consumption and production, grid and electricity provider data and facility ID numbers.
Customer service and case handling – managing correspondence regarding service matters, purchases, complaints or claims.	Legitimate Interest Necessary to manage cases and customer interactions.	Communication history, service requests and complaint details.

08.

How We Protect and Manage Your Personal Data

We use IT systems to ensure confidentiality, integrity, and access control of personal data. We have taken security measures to protect your personal data against unlawful or unauthorized processing (such as unlawful access, loss, destruction or damage). Only the people who actually need to process your personal data in order for us to fulfill our stated purposes have access to the data.

Flower retains personal data only for as long as necessary for the purposes outlined in this policy. This includes the duration of the business relationship and a limited period thereafter, as required for legal, regulatory, or operational needs.

Personal data that is being processed electronically by Flower will mainly be stored on servers located in EU/EEA.

Once personal data is no longer required, it is securely deleted or anonymized in accordance with applicable laws and internal policies. In cases where we process your personal data based on your consent or explicit consent, you can at any time revoke this consent, which you do by contacting us at privacy@flower.se.

09.

Business Partners

Flower processes and, where relevant, shares personal data with other independent business partners, such as partners, suppliers and consultants. Such processing and sharing are always based on a valid legal basis under applicable data protection laws, such as the performance of a contract, compliance with legal obligations or the legitimate interests of the parties involved. Depending on the context of the data processing, these partners may act as independent data controllers, joint controllers or data processors.

The personal data processed in these relationships may include contact details, communication records and information necessary for maintaining and fulfilling the business relationship.

10.

International Data Transfers

We aim to process your personal data within the EU/EEA whenever possible. However, in some cases, your personal data may be processed outside this area — for example, by service providers we work with. Some of our suppliers, or their parent companies or subcontractors, are located outside the EU/EEA. In such situations, we take into account the risk that your data could be accessed from outside the EU/EEA, for instance due to requests from foreign authorities.

If any of the recipients of your personal data are located outside the EU/EEA, this also means that your data may be transferred internationally.

To ensure your personal data remains protected when transferred outside the EU/EEA, we rely on safeguards approved under the GDPR. These include:

Adequacy decisions issued by the European Commission. These confirm that certain countries outside the EU/EEA offer a level of data protection equivalent to that of the EU. For instance, we may rely on the EU-US Data Privacy Framework for transfers to the United States, or the adequacy decision for the United Kingdom.

Standard Contractual Clauses (SCCs) issued by the EU Commission. These are legal agreements entered into with the data recipient, ensuring that your data remains protected according to GDPR standards, and that your rights are upheld.

In addition to these legal mechanisms, we also implement technical and organizational security measures to further protect your personal data in the event of any unauthorized access. The exact measures depend on what is technically possible and effective for each specific transfer.

11.

Data controller

Flower acts as the data controller for personal data processed under this policy. In some cases, subsidiaries of Flower may also act as independent or joint data controllers, where applicable. All such processing is conducted in accordance with the responsibilities set out in this policy and the overarching General Privacy Policy.

If you have any questions or requests, you can always contact us at privacy@flower.se or at:

Flower Infrastructure Technologies AB

Att: Privacy

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116 45 Stockholm