

## **Privacy Policy**

Last modified: April 14, 2022

RENOGY ("us", "we", or "our") operates on RENOXY ONE device (hereinafter referred to as the "Service").

This page informs you of our policies regarding the collection, use and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from <https://www.renogy.com>.

### **Definitions**

#### **Service**

Service includes but not limited to, serving as a central control panel for your RENOXY ONE system, enabling you to control your entire system from one single touchscreen, connecting energy devices and smart accessories, and synchronizing this data to your RENOXY server and mobile App.

#### **Personal Data**

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

#### **Usage Data**

Usage Data is data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, your IP address and user log).

#### **Data Controller**

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

## **Data Processors (or Service Providers)**

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

## **Data Subject (or User)**

Data Subject is any living individual who is using our Service and whose Personal Data is collected by us.

## **Information Collection and Use**

We collect several different types of information for various purposes to provide and improve our Service to you.

## **Types of Data Collected**

### ***Personal Data***

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Address, State, Province, ZIP/Postal code, City

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or the instructions provided in any email we send.

### ***Usage Data***

We may also collect information on how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your Renogy One Internet Protocol address (e.g. IP address), 4G/5G and WIFI access information, power usage, sensor history, user log, unique device identifiers and other diagnostic data.

### ***Location Data***

We may use and store information about your location if you give us permission to do so ("Location Data"). We use this data to provide features of our Service, to improve and customise our Service.

You can enable or disable location services when you use our Service at any time by way of your device settings.

## **Use of Data**

RENOGY uses the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

## **Legal Basis for Processing Personal Data under the General Data Protection Regulation (GDPR)**

If you are from the European Economic Area (EEA), UK or Switzerland, RENOGY's legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

RENOGY may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it is not overridden by your rights
- To comply with the law

## **Retention of Data**

RENOGY will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

RENOGY will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer periods.

### **Transfer of Data**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside the United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and process it there.

RENOGY will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

### **Disclosure of Data**

#### **Disclosure for Law Enforcement**

Under certain circumstances, RENOGY may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### **Legal Requirements**

RENOGY may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of RENOGY
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

### **Security of Data**

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## **Your Data Protection Rights under the General Data Protection Regulation (GDPR)**

If you are a resident of the European Economic Area (EEA), the UK or Switzerland, you have certain data protection rights. RENOGY aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

**The right to access, update or delete the information we have on you.** Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

**The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.

**The right to object.** You have the right to object to our processing of your Personal Data, in certain circumstances including where we are processing your Personal Data on the basis of our legitimate interests.

**The right of restriction.** You have the right to request that we restrict the processing of your personal information.

**The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

**The right to erasure.** You have the right to request that your Personal Data be deleted in its entirety from our systems. We will comply with your request unless we are required to retain your Personal Data due to legal or regulatory requirements, as stated in this policy.

**The right to withdraw consent.** You also have the right to withdraw your consent at any time where RENOGY relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data

protection authority in the European Economic Area (EEA), the ICO in the UK or the Federal Data Protection and Information Commissioner in Switzerland.

## **Your Privacy Rights under the California Consumer Privacy Act (CCPA)**

If you are a California resident, you have certain privacy rights as specified under California law, including the CCPA. These include:

### **The right to know what personal information we collect**

**The right to know who we share your data with.** We do not sell your data, but we do share your information with others for legitimate business purposes, as described above.

**The right to request deletion of your data,** unless an exception applies. Examples of exceptions include when we need to keep data to meet legal obligations or fix security issues. Upon your verified request, we will delete your personal information unless an exception applies, and will direct our service providers to do the same.

**Get a timely response.** You have the right to make two free requests in any 12 month period. We will respond to your request within 45 days, and in more difficult cases we may extend our response time by another 45 days.

**Non-discrimination.** We will not hold it against you when you exercise any of your rights, and we encourage you to review your privacy settings closely and reach out to us with your questions.

Under the CCPA, we are required to inform you of the data we may collected in the last 12 months:

- Identifiers, such as your name, email address and IP address
- Internet or other electronic network activity information

We may share your personal information with a third party for business purposes or at your direction. We enter into agreements with our service providers in which they can only use your information for specific purposes and are required to ensure its confidentiality. In the past 12 months, we have disclosed the above categories of personal information for a business purpose or at your direction with our affiliates, services providers and third parties. For more details on third parties we share data with, please see the Service Providers section below.

Please contact us at [support@renogy.com](mailto:support@renogy.com) if you have any questions about data protection or if you wish to exercise any of your rights described above.

### **Service Providers**

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), provide the Service on our behalf, perform Service-related services or assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### **Analytics**

We may use third-party Service Providers to monitor and analyze the use of our Service.

### **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

### **Contact Us**

If you have any questions about this Privacy Policy, please contact us via [renogy.com/contact-us](https://renogy.com/contact-us).