

Privacy Policy

This privacy policy ("Privacy Policy") aims to describes how your personal data are processed by Planeto SA ("Planeto") and the rights to which you are entitled when visiting the Website or using the Services provided by Planeto.

1 Definition

- **Personal Data:** any information relating to an identified or identifiable person;
- Services: services provided by Planeto;
- **Data Controller:** a natural person who, alone or jointly with others, determines the purposes and means of Processing Personal Data;
- **Data Processor:** a natural person who processes Personal Data on behalf of the Data Controller;;
- **Processing:** any handling of Personal Data, irrespective of the means and procedures used, in particular the collection, storage, keeping, use, modification, disclosure, archiving, deletion or destruction of data;
- Website: the website of Planeto.

2 What are the general principles applicable to the Processing of Personal Data?

As a Swiss private-law entity, Planeto is responsible for the Personal Data processed by this company and is subject to the Federal Act on Data Protection (FADP; 235.1) and, where applicable the Regulation (EU) 2016/679 General Data Protection Regulation (GDPR).

The following principles are applicable to the Processing of Personal Data by the Start-up:

- Legality: Processing of Personal Data is based on legal grounds;
- Fairness and Transparency: Processing of Personal Data must be done in a recognizable manner for the Data Subject, and the purpose must be specified, explicit and legitimate. Personal Data must not be processed for any other purposes;
- **Proportionality:** Processing of Personal Data must be adequate, relevant and limited to what is necessary for that purpose;
- Accuracy: Personal Data must be accurate and updated. The Data Subject can request the modification of its Personal Data;
- Security: Personal Data is processed in a manner to ensure appropriate security and confidentiality and to prevent unauthorized access;
- Limiting storage: Personal Data is stored for a reasonable period to achieve the purpose for which they are collected and must be destroyed if they are not or no more necessary.

3 What kind of Personal Data will be processed?



Planeto is a Swiss start-up offering solutions to accelerate the energy transition by digitalising the design of sustainable district heating and cooling (DHC) networks in buildings and cities.

Within this framework, Planeto is processing Personal Data in relation with its Website and to provide the Services. Planeto only uses the data that are necessary to comply with its mission. It may include, but is not limited to:

- Contact and identification data such as your last name, first name, title, address, email address, telephone number, identification number;
- Financial data such as bank account information, payment information;
- IT user account data such as username, password;
- Interaction and usage data such as, information on "customer" segment and target group, user preference feedback, device type, operating system, software, information from claiming rights;

Planeto may process different categories of Personal Data depending of your relationship with Planeto (customer, user of the website...).

4 What are the purposes of Processing your Personal Data?

Planeto processes your Personal Data for various purposes within the framework of its missions, including but not limited to:

- provide and maintain the Website and our Services;
- contact and identify you;
- answer your questions and communicate with you;
- notify you about changes to our Services;
- gather valuable information that we analyze so that we can improve our Services;
- monitor the usage of the Website and our Services;
- detect, prevent and address technical issues;
- contact you with newsletters, marketing and promotional materials and other information that may interest you.

5 How long do we keep your Personal Data?

In accordance with the principle of limiting storage, Planeto will retain your Personal Data only for as long as it is necessary for the purposes set out in this Privacy Policy and to the extent necessary to comply with legal requirements.

6 Who has access to your Personal Data?

Your Personal Data are provided to the collaborators of Planeto, where applicable and onlyfor the purpose of implementing their tasks.

Your Personal Data is mainly processed by Planeto, but Planeto may employ third party companies and individuals to facilitate or provide the Services on its behalf (e.g. IT providers).



The selected third parties are based in countries subject to legislation that guarantees adequate protection.

These third parties have access to your Personal Data only to perform these tasks and have to comply with regulations applicable to data protection.

Planeto may disclose your Personal Data for complying with a legal requirement or the decision of a court or an official authority.

7 How do we protect your personal data?

Planeto takes all reasonable administrative and technical measures to prevent any unauthorised disclosure and use, alteration or erasure of Personal Data.

8 Cookies policy

Cookies are text files with data created by a website and temporarily or permanently stored in the user's computer. It provides the website with a way to recognize you, keep track of your preferences and establish statistics.

When you visit Planeto Website, your Personal Data may be collected through cookies to improve your user experience.

9 Updating this Privacy Policy

This Privacy Policy may be updated at any time, without prior notice. The last version of the Privacy Policy will be posted on Planeto website.

10 What are your rights?

As Data Subject, you are entitled to:

- know what Personal Data Planeto is processing regarding you and request a copy of such data;
- request access to your Personal Data;
- request modification of your Personal Data if they are inaccurate or incomplete;
- request deletion or removal of your Personal Data, to the extent provided by law;
- object to certain types of Processing. In particular, you may opt-out at any time of receiving newsletters, marketing and promotional materials from Planeto.

To exercise those rights or for any information concerning this Privacy Policy, please contact: Planeto SA at <u>info@planeto-energy.ch</u>

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