

Solar-Log™ Data Privacy Policy

1. Data Protection Officer

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2. Type, Scope and Purpose of Data Processing

A Solar-Log™ device (hereafter referred to as "Solar-Log™") records and processes the following data:

- Solar Plant Type and Size
- Solar Plant Location
- Solar Plant Production
- Power Consumption (when a suitable meter has been installed and activated)
- Control Signals from the Grid Operator
- Control Signals from the Direct Marketer

As long as the Solar-Log™ is not connected to the Solar-Log WEB Enerest™ portal (hereafter referred to as "Portal"), the data listed above remains only in the Solar-Log™. The data can then only be accessed locally via the web interface of the Solar-Log™.

Other than with the "Solar-Log 50" device, you can access reports for the daily, monthly and yearly production curves and (if available) for the consumption, status and error log directly from the Solar-Log™. Internet access is therefore not required.

With the "Solar-Log 50," it is only possible to access such reports from the Portal.

When the Solar-Log™ is connected to the internet, the data listed above is generally transferred automatically to the Portal. Personal data and plant data are securely transmitted with encryption. The raw measured data is transferred unencrypted, but it is impossible to interrupt the measured data without the configuration.

There is the option to register the Solar-Log™ in the Portal to receive reports (as listed above) and alarm messages via e-mail or app. When registered in the Portal, the data listed above is transferred to the portal.

The following data is also required for the Portal registration:

- Title
- First and Last Name
- Country
- Language
- Address (Plant Location)
- E-mail Address

You can enter the following data voluntarily:

- Company
- Address
- ZIP code and City
- Telephone Number
- Images of the Plant
- Orientation and Pitch of the Module
- Inverter Manufacturer
- Module Manufacturer
- Installation Date of the PV Plant

The Portal offers the option for data visualization, reports and alarms.

With registration in the portal as well as at any time after registration, you can determine in the settings and partial in the data logger itself which information you voluntarily enter in the portal and whether or which data should be published on the internet for everyone to see.

The reports and alarms are independent of this, so they can also take place if you omit the voluntary information and/or do not want to be made public it or delete it later.

3. The Legal Basis for Data Processing

The processing of your personal data takes place within the framework of Article 6, Paragraph 1, Section 1, Point B of the GDPR provided that this is required for the operation of the Solar-Log, creating and sending reports and alarm messages. If you provide additional, voluntary information, this will only happen on the basis of your express consent in accordance with Article 6, Paragraph 1, Section 1, Point A of the GDPR. In addition, data processing may take place if it is in our legitimate interest to do so in accordance with Article 6, Paragraph 1, Section 1, Point F of the GDPR and there is no overriding interest on your part worthy of protection. For example, we have a legitimate interest in data processing for the purpose of making the use of the Portal more user-friendly, recognizing and ensuring the security and stability of the systems, or facilitating and improving the administration of the Portal.

The processing specifically does not take place for the purpose of gaining personal data.

4. Third Party Access

4.1. Access directly from the Solar-Log™ itself

Contractors or installers can view the reports, status information and error log that can be accessed directly from your Solar-Log™ device to fulfill their assignments, e.g. for repair or maintenance.

4.2. Direct log on of the Solar-Log™ owner via the Portal

If you as the owner of the Solar-Log™ register directly in the Portal yourself, a third party, e.g. a contractor or an installer, only has access to the data available there if you give your express and voluntary consent. This consent for the contractor or installer can of course be withdrawn at any time.

4.3. Log on of the contractor/installer

We offer contractors/installers the option to set up their own platform to manage their service and maintenance contracts and to monitor the plants connected to their Portal.

If you have entered into such an agreement with your contractor/installer, the contractor/installer is responsible for data processing and data protection compliance.

In this case, the contractor/installer has full access to the data entered on their platform and to your information that is made public via the Portal.

If you want to change the contractor/installer or use the portal directly yourself, you can migrate your data as follows:

https://www.solar-log.com/manuals/manuals/en_GB/SolarLog_Migration_from_Classic_1st_to_WEB_Enerest_via_FTP_3x_EN.pdf

(Migration of a C1 Portal to Enerest Home)

All other migration types have to be initiated from the installer in the Portal.

5. Disclosure of Personal Data to Third Parties

Personal data is disclosed to third parties if

- you expressly consented to this in accordance with Article 6, Paragraph 1, Section 1, Point A of the GDPR,
- the disclosure is necessary for the establishment, exercise or defense of legal claims in accordance with Article 6, Paragraph 1, Section 1, Point F of the GDPR and there is no overriding interest on your part worthy of protection,
- a legal obligation exists for the disclosure of data in accordance with Article 6, Paragraph 1, Section 1, Point C of the GDPR, and/or
- this is necessary to fulfill our contractual obligations with you in accordance with Article 6, Paragraph 1, Section 1, Point B of the GDPR.

In all other cases, personal data will not be disclosed to third parties.

Consumption and production data including the location - geographical data is reduced to two decimal places - can be passed on to scientific institutions in anonymized form for research purposes. From the anonymized data, it is not possible to identify the person concerned.

6. Your Rights as a Data Subject

The GDPR grants you as the person concerned the following rights with regard to the processing of your personal data.

6.1. Right of Access, Article 15 of the GDPR

You can request information from us as to whether and, if so, what personal data of yours is stored and processed by us.

There is no right to information if granting access to the requested information would violate any confidentiality obligations or if the information has to be kept secret for other reasons, in particular for the sake of the overriding interests of a third party. Deviation from this obligation to provide access to information may result if your interest in information prevails over the interest in confidentiality, in particular when there is immediately impending damages. The right of access is also excluded if the data is only stored because it may not be deleted due to legal or statutory retention periods or solely for purposes of data security or data protection control, provided that the right of access to information would require a disproportionately high effort and processing for other purposes by appropriate technical and organizational measures is excluded.

In the case that the right to information is not excluded and your personal data is processed by us, you can request information from about the following data:

- Purposes of the processing,
- Categories of your processed personal data,
- Recipients or categories of recipients to whom your personal data will be disclosed, in particular third party recipients in other countries,
- If possible, the planned duration for which your personal data will be stored or, if this is not possible, the criteria for determining the duration of storage
- The right to rectification or erasure or limitation of the processing of your personal data, or a right to object to such processing,
- The right to lodge a complaint with a supervisory authority for data protection,
- If the personal data has not been collected from you as the data subject, the available information on the data source,
- If applicable, the existence of automated decision-making, including profiling, meaningful information about the logic involved, as well as the significance and the envisaged consequences of automated decision-making,
- If applicable, in the case of transmission to third party recipients in other countries, in the absence of a decision by the EU Commission on the adequate level of protection in accordance with Article 45, Paragraph 3 of the GDPR, information on which appropriate safeguards in accordance with Article 46, Paragraph 2 of the GDPR are provided for the personal data protection.

6.2. Rectification and Completion of Personal Data, Article 16 of the GDPR

If you discover that we have inaccurate personal data about you, you may request that we correct this inaccurate data immediately. You may request the completion of incomplete personal data.

6.3. Right to Erasure, Article 17 of the GDPR

You have a right to erasure ("right to be forgotten") as long as the processing is not necessary for exercising the right of freedom of expression, the right to information, or for compliance with a legal obligation or for the performance of a task carried out in the public interest and one of the following reasons applies:

- The personal data is no longer necessary for the purposes for which they were collected or otherwise processed.
- The legal bases for the processing was based solely on your consent and you have withdrawn this consent.
- You have objected to the processing of your personal data that we have made public.
- You have objected to the processing of your personal data that we have not made public and there is no overriding legitimate reasons for processing it.
- Your personal data have been unlawfully processed.
- Your personal data has to be erased for compliance with a legal obligation that we are subject to.

There is no right to deletion if the deletion is not possible or only possible with disproportionately high effort in the case of lawful non-automated data processing due to the special type of storage and your interest in the deletion is low. In this case, a restriction of processing will take the place of deletion.

Consumption and production data including the location (the first three digits of the zip code) can be passed on to scientific institutions in anonymized form for research purposes. From the anonymized data, it is not possible to identify the person concerned.

6.4. Right to Restriction of Processing, Article 18 of the GDPR

You may request a restriction of processing when one of the following reasons applies:

- You are contesting the accuracy of the personal data. A restriction can be requested for the duration of our check to verify the accuracy of the personal data.
- The processing is unlawful and you request a restriction of processing your personal data rather than deletion.
- We no longer need your personal data for the purposes of the processing, but this data required for the establishment, exercise or defense of legal claims.
- You have made an objection in accordance with Article 21, Paragraph 1 of the GDPR. The restriction of processing may be requested when it is not yet certain whether our legitimate reasons override your legitimate reasons.

Restriction of processing means that personal data is only processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest. We are required to inform you before the restriction of processing is lifted.

6.5. Informing Third Parties, Article 19 of the GDPR

Provided that you have requested rectification or deletion of personal data or restriction of processing (Paragraph 6.2, 6.3 or 6.4), we are required to inform each recipient of your disclosed personal data about your request for rectification, deletion or restriction.

If this proves to be impossible or involves disproportionate effort, we will inform you about this recipient.

6.6. Right to Data Portability, Article 20 of the GDPR

You have the right to data portability as long as the processing is based on consent (Article 6, Paragraph 1, Section 1, Point A) or on a contract to which you are a party and the processing is carried out by automated means. In this case, the right to data portability includes the following rights, provided that the rights and freedoms of other persons are not affected: You may request to receive your personal data that you have already provided us in a structured, conventional, machine-readable format. You have the right to transfer this data to another person without any hindrance on our part. As far as technically feasible, you can request that we transfer your personal data directly to another person.

6.7. Right to Object

If the processing is based on Article 6, Paragraph 1, Section 1, Point E of the GDPR (performance of a task carried out in the public interest or in the exercise of official authority) or on Article 6, Paragraph 1, Section 1, Point F of the GDPR (legitimate interests pursued by the person responsible or by a third party), you have the right to object to the processing of your personal data at any time for reasons arising from your particular situation. This also includes profiling based on Article 6, Paragraph 1, Section 1, Point E or F of the GDPR. After exercising the right of objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

You may object at any time to processing of your personal data for direct marketing purposes. This also includes profiling to the extent that it is related to such direct marketing. After you have exercised this right of objection, we will no longer use your personal data for direct marketing purposes.

You have the option of informing us of your objection by telephone, e-mail, fax or by sending it in writing to our address listed in the beginning of this declaration.

6.8. Right of Consent Withdrawal, Article 7, Paragraph 3 of the GDPR

You have the right to withdraw your consent at any time. We will immediately delete your affected personal data, unless further processing of your personal data is also based on a legal basis for processing without consent.

You can inform us of the withdrawal of consent by telephone, e-mail, fax or by sending it in writing to our address. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

6.9. Right to Object, Article 21 of the GDPR

You can also object at any time to the processing of your personal data if we process it within the scope of balancing interests on the basis of our special interest (Article 6, Paragraph 1, Section 1, Point F of the GDPR) with effect for the future, if there are reasons arising from your particular situation.

If you exercise your right of objection, we will stop processing your personal data.

Continued processing is only reserved for those cases in which we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, especially for the establishment, exercise or defense of legal claims.

6.10. Right to Lodge a Complaint, Article 77 of the GDPR

If you believe that there is unlawful processing of your personal data, you may lodge a complaint with a data protection supervisory authority responsible for your habitual residence, place of work or place of the alleged infringement.

7. Storage Period

The period for which your personal data is stored depends on the respective legal retention periods, commercial or tax law regulations in particular.

In addition, your personal data will be deleted unless it is required for the purpose of initiating or fulfilling a contract or processing a contract. This is in particular the case for the assertion, exercise or defense of legal claims within the framework of the relevant limitation period.