

# Privacy Notice

## Smoov

Last updated: April 15, 2019

### Introduction

Smoov is an app that is provided to you by Allego. Smoov makes your life easier, because you will always be able to find an available charging station in your area, quickly and easily. You can see how much you are charging at any given time. Smoov also sends you notifications you when your favorite charging station becomes available, or when it is occupied. Soon, you will even be able to reserve a charging station with Smoov. In order for you to use our Smoov services, Allego has to process some categories of your personal data. Allego takes its responsibilities towards processing your personal data seriously. This Privacy Notice describes Allego's practices how we collect, use, disclose, transfer and store your personal data. It also outlines your privacy rights. Privacy is an ongoing responsibility, and so Allego will from time to time update this Privacy Notice in case Allego undertakes new practices with regard to processing personal data or adopt new privacy policies.

### Data Protection Officer

Allego is headquartered in Arnhem, the Netherlands. Allego has appointed a Data Protection Officer for you to contact if you have any questions or concerns about Allego's personal data policies or practices. Allego's Data Protection Officer's contact information is as follows:

Allego B.V.  
Attn: Data Protection Officer  
Industriepark Kleefse Waard  
Westervoortsedijk 73  
6827 AV Arnhem  
The Netherlands  
[dpo@allego.eu](mailto:dpo@allego.eu)  
+31 (0)88-7500300

### What Personal Data We Collect and How We Use It

Allego and its contracted third parties collect personal data from Smoov users. This personal data is limited to the kinds of information that is required in order to make use of Smoov services. The processing of your personal data is necessary if you want to make use of Smoov. This personal data can include initials, last name, email address, telephone number, Facebook account name, Google account name, charge card, bank account number and credit card number. Allego uses this personal data to provide you with our Smoov services, including remembering your preferred settings, payment for charging sessions, finding a charging station and (in the near future) reserving charging stations. Allego only shares your personal data with contracted third parties who are facilitating the delivery of Smoov services on behalf of Allego. In the following section an insight is given into: what personal data we process when logging into Smoov, using your location data, paying for charging sessions, and providing customer service.

### When logging into Smoov

There are three ways in which you can use Smoov and Allego collects and processes your personal data for payment services. You decide which method you use.

**Method #1: You can use Smoov as a guest.** If you use Smoov as a guest, you don't have to register and provide your name or email address. When you use Smoov as a guest, you can use the app to search for charging stations and pay for charge sessions through direct payment (i.e. through your bank or credit card provider). Services like favorizing and monitoring of chargers will become available, even if you use Smoov as a guest. Personal preferences and charging session history can also be referenced. Personal data that is processed while using these services (like favorizing), will be erased each time when you close the Smoov app.

**Method #2: You create an account in Smoov through your personal Facebook or Google account.** In order to use your personal Facebook or Google account, you will need to log in via one of these accounts and allow Smoov to access your name. When logging in through Facebook or Google, these two providers also provide Allego automatically with your IP address of the location from which you log in into Smoov. Allego does not use this information and automatically deletes this after 90 days. The permission to use these accounts can always be revoked through your Facebook and Google accounts. When you log in into Smoov with one of these accounts, you can use the direct payment method, pay with a credit card or use your charge card issued by your Mobility Service Provider (MSP). Services like favorizing and monitoring of chargers will become available. Personal preferences and charging session history can also be referenced. When you close the app, your preferences, like favorizing charging, will be stored (unlike when you log in as a guest).

Note: when you log in into Smoov using this method, Facebook and Google stores information on the frequency of logging into/using Smoov. Allego does not share any information with Facebook or Google such as your personal preferences (such as payment method, car model, preferred chargers).

**Method #3: You create an account by using your email account.**

You can create an account by using your email address. To do so, you must use your email address. When you log in into the Smoov app with your email address, you can use the direct payment method, pay with credit card or use your charge card issued by your Mobility Service Provider (MSP). The same as with logging in with Facebook or Google, services like favorizing and monitoring of chargers will become available. Personal preferences and charging session history can also be referenced. When you close the app, your preferences, like favorizing charging will be stored (unlike when you login as a guest).

### When using your location data

You can use Smoov to locate, check availability, and (in the near future) reserve Allego charging stations. The default setting in Smoov is set to not track your location. If you want to use our service to look up, check availability, and (in the near future) reserve charging stations you must give explicit permission through Smoov on your phone to use your location. Allego does not store, nor track your location through this functionality. For this function, the terms and conditions as well as privacy settings of Google maps apply.

### When adding your charge card to Smoov

To be able to use your charge card, you must enter your charge card number issued by your charge card service provider (i.e. Mobility Service Provider - MSP). Your charge card contains a unique number, which is linked to your personal account. This processing of this personal data is necessary for Allego and your service provider to enable you to charge your vehicle. Your charge card details are directly sent through a secured connection to the relevant service provider, enabling the charging sessions to be invoiced to your MSP. Your charging sessions that you carried out at Allego charging stations with your charge card are visible in your Smoov account.



Allego and your service provider share responsibilities with regard to the processing of your personal data. Please contact your service provider if you have any questions about how your service provider processes your personal information.

### When paying for a charging session through the direct debit method

In order to use the direct debit payment method, you must carry out a SEPA registration with Allego's payment (service) provider through Smoov. In order to do so you must fill in: your initials, your last name, your IBAN (bank account number) and your email address. The processing of this information is necessary if you want to use this payment method. When you choose to charge your vehicle through a direct payment, your bank account details are sent directly through a secure connection to Allego's payment provider. Allego does not itself store the bank account information. However, Allego is able access payment data, for example for trouble shooting and carrying out reimbursements.

### When paying for a charging session with a credit card

In order to use the credit card payment method, you must register your credit card with the payment (service) provider through Smoov. The processing of this information is necessary if you want to use this payment method. Your credit card information is provided by you directly and sent through a secure connection to Allego's payment provider, which follows the Payment Card Industry Data Security Standard (PCI DSS) when handling your credit card data. Allego does not, itself, process or store your credit card information. However, Allego is able access credit card payment data, for example for trouble shooting, reimbursements, etc.

### When contacting the Allego service desk

You can correspond with us by email, telephone, or the postal service. We retain such correspondence and the information contained in it and use it to respond to your inquiry; to notify you on other related services; or to keep a record of your complaint, request, and the like.

### Improving our services

We use data about all charging sessions for internal purposes (for example: time, duration, location of the charging session) to improve the quality and coverage of our charging stations.

## When and How We Share Information with Third Parties

Information about your charging sessions are maintained in association with your account. The personal information Allego processes from you is stored in one or more databases hosted by third parties Allego has contracted and are located in the European Union. These third parties do not use or have access to your personal data for any purpose other than cloud storage and retrieval related to the services of Smoov.

We do not otherwise reveal your personal data to third parties for their independent use unless: (1) you request or authorize it; (2) the information is provided to comply with the law (for example a court order), enforce an agreement we have with you, or to protect our rights; or (3) the information is provided to our agents or service providers who perform functions on our behalf. We also gather aggregated (but not personally identifiable) information about charging sessions from Smoov users and use such aggregated information to our partners, service providers, and/or other third parties for improving Smoov (related) services.

## Transferring Personal Data within the European Economic Area

Allego has its headquarters in the Netherlands and is subject to the EU General Data Protection Regulation. Information we collect from you will be processed solely by Allego and our contracted third parties in the European Union.

## How Long We Keep Your Personal Data

We keep your personal data to enable your continued use of Smoov, for as long as it is required in order to fulfil the relevant purposes described in this Privacy Notice, or as is required by law such as for tax and accounting purposes.

## Your Data Protection Rights

The EU's General Data Protection Regulation and other countries' privacy laws provide certain rights for you. A proper explanation of these laws and rights is available on the websites of various Supervisory Authorities in the countries in which Allego operates:

Click [here](#) for the Belgian website of the Gegevensbeschermingsautoriteit / Autorité de protection des données.

Click [here](#) for the German website of the Bundesdatenschutzbeauftragte.

Click [here](#) for the Dutch website of the Autoriteit Persoonsgegevens.

Click [here](#) for the U.K. website of the Information Commissioner's Office.

This Privacy Notice is intended to provide you with information about what personal data Allego collects about you and how it is used. If you have any questions, please contact our Data Protection Officer at [dpo@allego.eu](mailto:dpo@allego.eu).

If you wish to confirm that Allego is processing your personal data, or to access your personal data which Allego may have stored, please contact our Data Protection Officer at [dpo@allego.eu](mailto:dpo@allego.eu).

You may also request information about: the purpose of the processing; the categories of personal data involved; who else outside Allego might have received the data from (or through) Allego; and how long the information will be stored. Details pertaining to charging sessions are securely stored for the statutory minimum amount of time. All other data is stored as long as you make use of a particular service or during the legal retention period.

You have a right to correct (rectify) the record of your personal data maintained by Allego if it is inaccurate. You may request that Allego erase that data or cease to process it (if you have granted us explicit permission to process such data), subject to certain exceptions. You have a right to lodge a complaint with the Dutch data protection authority ('Autoriteit Persoonsgegevens'), regardless of the country in which you Smoov, if you have any concerns about how Allego processes your personal data. Your complaint must be addressed to the Dutch Data Protection Authority in the Netherlands. Click [here](#) for their contact details.

Reasonable access to your personal data will be provided at no cost to you upon request submitted to Allego at [dpo@allego.eu](mailto:dpo@allego.eu). If access cannot be provided within a reasonable time, Allego will inform you about an expected date on which this information will be provided. If for some reason a request for access to information is denied, Allego will provide a rationale for doing so.



If you wish to have Allego “erase” your personal information or otherwise refrain from communicating with you, please contact us at [dpo@allego.eu](mailto:dpo@allego.eu). Your account can be erased, while the charging sessions at Allego charging stations will be stored or as is required by law such as for tax and accounting purposes.

## Security of Your Personal Data

To help protect the personal data you transmit through the usage of Smoov, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your personal data to those staff members who need to be aware of this information to provide benefits or services to you. In addition, we train our staff members about the importance of confidentiality and maintaining the privacy and security of your information. We are committed to taking appropriate disciplinary measures to enforce our staff members’ privacy responsibilities.

## Changes and Updates to This Privacy Notice

As our services and use of technology may change from time to time, this Privacy Notice is expected to change as well. We reserve the right to amend this Privacy Notice at any time, for any reason and without notice to you, other than publishing the amended Privacy Notice on our website <https://www.smoovapp.eu/>. We may publish reminders of our Privacy Notice on our website, but we advise you to frequently check our website to review the currently applicable Privacy Notice and any changes that may have been implemented in it since its previous version.

## Questions, Comments or Complaints

If you have any questions or comments about this Privacy Notice or if you would like to obtain information about any of your personal information stored by us, please contact us at:

Allego B.V.  
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Industriepark Kleefse Waard  
Westervoortsedijk 73  
6827 AV Arnhem  
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