PRIVACY POLICY — WERENODE

Android and iOS Mobile Application

Version dated 1 January 2026

1. Introduction

Protecting your personal data is important to Werenode.

This Privacy Policy explains how WERENODE SAS collects, uses, retains and protects your personal data when you use the Werenode mobile application (hereinafter referred to as the "Application").

The Application allows users, in particular, to search for electric vehicle charging points, view their characteristics and prices, carry out charging sessions and, depending on the available features, make their own charging points available to other users.

We process your data in accordance with the General Data Protection Regulation (GDPR), the French Data Protection Act (*Loi Informatique et Libertés*) and other applicable regulations.

This Policy applies to drivers, charging point owners or operators, and other users of the Application.

2. Data Controller

The controller responsible for processing personal data is:

WERENODE SAS

- A simplified joint-stock company incorporated under French law (*société par actions simplifiée*)
- SIREN registration number: 839 811 098
- Registered office: 1 rue Faulkner, 78180 Montigny-le-Bretonneux, France
- Website: https://werenode.com
- Privacy contact: contact@werenode.com

For any questions concerning your personal data or to exercise your rights, you may contact us at the address indicated above.

For certain services provided with partners, particularly charging point operators, Werenode may act as a data processor or joint controller. In such cases, the roles and responsibilities of the organisations concerned are specified in the information applicable to the service.

3. Personal Data Collected

Depending on the features you use, we may process the following categories of data.

3.1. Identification and Account Data

- First and last name;
- Email address;
- Telephone number, where requested;
- Account identifier;

- Authentication information required for login;
- Account preferences and settings.

Some information is necessary to create and manage an account. Other information is optional.

3.2. Vehicle and Charging Data

- Vehicle information, where provided;
- Identifiers and locations of charging points used;
- Dates, times and durations of charging sessions;
- Amounts of energy delivered;
- Applicable prices and amounts charged;
- Charging session status and any technical incidents;
- Charging history.

This information is used to ensure the operation of the service, process transactions and enable their monitoring.

3.3. Location Data

Subject to the necessary permissions, the Application may access the geographical location of your device to suggest nearby charging points and facilitate their location.

Geolocation is used to the extent necessary for the requested features.

You may modify or withdraw permission to access your location through your Android or iOS device settings.

Where this option is available, you may also search for a charging point by manually entering an address or location.

Refusing geolocation permission may limit certain nearby search features without necessarily preventing the use of other services.

Werenode does not use location data for advertising purposes without an appropriate legal basis and, where necessary, your consent.

The precise collection arrangements, including any access to background location and retention of location data, are specified according to the features actually offered.

3.4. Payment and Billing Data

When a charging session or another service is subject to payment, we may process:

- Transaction references;
- Payment amounts, currencies and dates;
- Information required for billing;
- Transaction identifiers provided by payment service providers;
- Information relating to refunds or disputes.

Banking data required to process payments may be handled directly by specialised payment service providers.

Payment card information is processed in accordance with the technical and contractual arrangements of the relevant service providers.

3.5. Data Relating to Charging Point Owners or Operators

If you make a charging point available through Werenode, we may also process:

- Your identity and contact details;
- The address and characteristics of the charging point;
- Availability schedules and conditions;
- Prices offered;
- Information required for financial payouts;
- Charging point operating and usage data.

Certain information relating to the charging point, including its location, characteristics, access conditions and prices, may be visible to other users of the Application.

A Host's personal information is made public only to the extent necessary for the operation of the service and in accordance with the information provided to the Host.

3.6. Technical Data

We may collect technical information necessary for the operation and security of the Application, including:

- Device type and operating system;
- Application version;
- IP address;
- Technical identifiers necessary for service operation;
- Connection and error logs;
- Diagnostic and security data.

This information helps resolve incidents, ensure Application compatibility and prevent fraudulent use.

3.7. Communications with Werenode

When you contact our support service, we may retain your request, the information necessary to process it and the related communications.

4. Purposes and Legal Bases for Processing

We use your personal data only for specified purposes and on an appropriate legal basis.

Purpose	Main legal basis

Account creation and management	Performance of a contract
Searching for and using charging points	Performance of a contract or pre-contractual measures
Organisation and monitoring of charging sessions	Performance of a contract
Payments and refunds	Performance of a contract
Accounting and tax obligations	Legal obligation
Management of charging points offered by Hosts	Performance of a contract
Support and complaint handling	Performance of a contract or legitimate interests, depending on the circumstances
Security, fraud prevention and diagnostics	Legitimate interests or legal obligation
Optional geolocation	Legal basis appropriate to the relevant use, including consent where required
Electronic marketing communications	Consent where required, or another applicable legal basis
Statistics and service improvement	Legitimate interests or consent where required

Where we rely on our legitimate interests, we ensure that the processing is necessary and proportionate and does not unduly interfere with your rights and freedoms.

Optional processing activities requiring your consent are carried out only after that consent has been obtained.

You may withdraw your consent at any time without affecting the lawfulness of processing carried out before its withdrawal.

5. Sharing of Personal Data

We disclose your personal data only to recipients who need access to it for the purposes described in this Policy.

These recipients may include:

- Authorised Werenode personnel;
- Technical service providers responsible for hosting, maintaining and operating the Application;
- Payment and billing service providers;
- Charging point owners and operators, to the extent necessary to provide the service;
- Support and security service providers;

- Administrative or judicial authorities, where required by law.

Service providers acting as data processors are subject to appropriate contractual confidentiality and data protection obligations.

We do not sell your personal data to data brokers.

Any sharing for third-party marketing purposes is subject to applicable legal requirements, particularly those relating to information and consent.

6. Data Accessible to Other Users

When you use the features allowing you to share or make a charging point available, certain information may become visible to other users.

This may include the charging point's location, technical characteristics, availability schedules and applicable prices.

We encourage you to review the information made public when registering a charging point located at your home or on private property.

A Driver's personal data and charging history are not intended to be publicly accessible.

However, certain information necessary to manage a charging session may be communicated to the relevant operator, within the limits described in this Policy.

7. Payments Using Blockchain Technologies

Certain Werenode features may use blockchain technologies or digital assets.

When a transaction is recorded on a public blockchain, certain information, such as a wallet address, transaction identifier, amount transferred or timestamp, may be publicly accessible.

Depending on the circumstances, this information may constitute personal data, particularly where it allows a transaction to be linked to an identifiable person.

Data recorded on a blockchain may be difficult, or even impossible, to modify or erase due to the technical characteristics of the network.

Werenode endeavours to limit personal data recorded directly on a blockchain and to inform users of the consequences of such operations.

Specific conditions applicable to these features are communicated before their use.

8. Data Retention Periods

We retain personal data for a limited period determined according to its purpose and applicable legal obligations.

The following retention principles apply:

Data category	**Retention principle**
Account data	During account use, then for the periods necessary for account closure and compliance with applicable obligations

Charging history	For the period necessary to monitor services, manage billing and handle disputes
Accounting documents and supporting records	In accordance with legally required retention periods
Location data	For the period strictly necessary for the relevant features
Technical and security logs	For a limited period proportionate to security requirements
Support requests	For the period necessary to process requests and manage any disputes
Data used for marketing	In accordance with the rules and retention periods applicable to that purpose

Precise retention periods are defined according to the processing activities actually carried out and may be communicated upon request.

Upon expiry of the applicable periods, data are deleted or anonymised, unless further retention is legally justified.

9. Data Security

Werenode implements appropriate technical and organisational measures to protect personal data against unauthorised access, loss, alteration and unlawful disclosure.

These measures may include:

- Access controls for information systems;
- Protection of communications;
- Securing authentication mechanisms;
- Monitoring technical and security incidents;
- Restricting access to authorised personnel only;
- Backup and incident management procedures.

No information system can guarantee absolute security. Werenode adapts its protective measures to identified risks and technological developments.

In the event of a personal data breach, we take the necessary measures and, where required by law, notify the competent supervisory authority and affected individuals.

10. Hosting and International Transfers

Personal data may be processed by Werenode and its service providers within the European Economic Area (EEA).

Where data are transferred to a country outside the EEA, Werenode ensures that the transfer is based on a mechanism recognised under the GDPR, including an adequacy decision or standard contractual clauses supplemented, where necessary, by additional safeguards.

Information concerning the main destination countries and applicable safeguards may be obtained from Werenode.

11. Notifications and Tracking Technologies

The Application may provide notifications relating to the operation of the service, including the start or end of a charging session, technical incidents or important account information.

Optional notifications may be managed through the Application or device settings, depending on the available options.

The Application may also use identifiers or technical mechanisms necessary for its operation, security or usage measurement.

Where trackers or similar technologies require prior consent, such consent is obtained in accordance with applicable regulations.

Users may manage the choices offered to them and withdraw their consent where consent constitutes the legal basis for processing.

12. Your Rights Regarding Personal Data

Under the GDPR, you have the following rights, subject to the conditions provided by applicable regulations:

- **Right of access:** Obtain information about the personal data concerning you and receive a copy;
- **Right to rectification:** Have inaccurate or incomplete data corrected;
- **Right to erasure:** Request deletion of your data where the legal conditions are met;
- **Right to restriction of processing:** Request the temporary restriction of certain processing activities;
- **Right to object:** Object to certain processing activities, particularly direct marketing;
- **Right to data portability:** Receive certain data in a structured, commonly used and machine-readable format;
- **Right to withdraw consent:** Withdraw previously given consent at any time;
- **Rights relating to certain solely automated decisions:** Benefit from the protections provided by the GDPR where applicable.

You may exercise these rights by contacting:

contact@werenode.com

We respond within the time limits provided by applicable regulations, generally within one month of receiving your request.

Verification of your identity may be requested where necessary to protect your data against unauthorised access.

You also have the right to lodge a complaint with the French Data Protection Authority (*Commission nationale de l'informatique et des libertés*, CNIL):

https://www.cnil.fr

13. Account Deletion

You may request deletion of your Werenode account using the features provided in the Application or the contact method indicated in this Policy.

Account deletion procedure: My Account → Delete My Account.

Deleting your account results in the erasure or anonymisation of data that are no longer necessary, subject to legal retention obligations and the need to manage any ongoing disputes or transactions.

Certain accounting, tax or transaction information may therefore be retained for the legally applicable periods.

Uninstalling the Application does not necessarily result in the deletion of your account or data stored on servers.

14. Minors

The Application and its contractual features relating to paid charging services are intended for persons having the necessary legal capacity to use the relevant services.

Werenode does not intentionally seek to collect personal data from children in connection with a service that is not intended for them.

If data relating to a minor have been collected in circumstances that do not comply with applicable regulations, their legal representative may contact Werenode to request a review and, where justified, deletion of the data.

15. Changes to the Privacy Policy

Werenode may amend this Privacy Policy to reflect changes in its services, personal data processing activities or legal requirements.

The current version is accessible through the Application and the Werenode website.

Users are informed of substantial changes by appropriate means.

Where a new processing activity requires consent, such consent is obtained before the processing begins.

16. Contact

For any questions concerning this Policy or the processing of your personal data:

WERENODE SAS

Website: https://werenode.com

Address: 1 rue Faulkner, 78180 Montigny-le-Bretonneux, France

Email: contact@werenode.com

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