

Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş. Privacy Agreement

Dear user,

"SiriuStorage" is a platform of inverter management operated by Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş.'s Data Co., Ltd. (hereinafter \"we\" or \"Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş.\"). We well know the importance of personal information to you and will spare no effort in protecting the security and reliability of your personal information. Please read this Privacy Statement carefully to understand our policies before using our products (or services) and make corresponding choices appropriate for you. If you disagree with the content of this Privacy Statement and choose not to provide us with your personal data, we may not be able to provide you with certain products (or services). Please note: We only provide products (or services) to adults. If you are a minor, please inform your parents (or guardians).

We will provide you with this product (or service) under the consent of your parents (or guardians). If we find ourselves collecting the personal data of children without the consent of the verifiable guardian, we will terminate the service and try to delete the relevant data as soon as possible.

We hope that you understand the following contents by reading this Privacy Statement:

1. What Type of Information Is Collected and Processed by This System and what is the purpose
2. How Such Information Is Used by This System
3. Whether This System Discloses Your Personal Information
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1 What Type of Information Is Collected and Processed by This System and what is the purpose

The system collects and processes the following personal information: user name, password, avatar, phone number, and email address; O&M personnel(Operation and Maintenance), GPS location information and inspection track; plant information, including the plant address, longitude and latitude, and the name and phone number of the plant contact; information about the devices within the plant, including ESN, registration code, SIM card number, current, voltage, power, energy yield, temperature, and alarm of the devices; personal information of the needy, including name, detailed communication address, phone number, and email address.

The system integrates Amap SDK or google map SDK. When creating, you can select the location of the power station through the map interface. When opening the map interface, app will apply for your current location information as the default address of the new power station.

The system integrates Tencent bugly's SDK. Bugly will obtain the application operation log information during your use of the app, so as to quickly locate problems in the application and provide you with better after-sales service. The SDK only collects the operation log information in the application.

The system needs to call the mobile phone camera and album permissions, which you use when you set the power station picture when creating the power station, or when setting your personal avatar. When you add equipment to the power station, you need to call the mobile phone camera function to scan the QR code, identify and obtain the serial number of the device, so as to complete the process of adding equipment.

Before using Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş.'s products or services, you may need to provide personal data. In some cases you may be able to opt not to disclose your personal data to Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş.. However, not providing Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş. with certain data may mean that we cannot provide you with certain products or services or respond to an issue that you have risen

Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş. may use your personal information for the following purposes:

1. Commission your inverter and create your plant in the system
2. Analyze the plant performance (our system would analyze the performance data of the plants and give the feedback to customers, each customer could only see their own plant)
3. Monitoring the plant status (the system would receive the plant real-time data, and will present the alarms and malfunctions received from loggers and inverters)

Moreover, Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş. will process your personal data following appropriate legal basis, including:

1. Processing your personal data to fulfill the contract;
2. Processing your personal data with your consent;
3. Processing your personal data as necessary to comply with and fulfill legal obligations.

This system integrates the push message push SDK provided by Daily Interactive Co., Ltd., for the purpose of providing App users with message push technology services, and will collect the following information:

(1) Device information: Device identification code (IMEI, IDFA, Android ID, MAC, OAID, Advertising ID, Serial Number, IMSI, UAID, ICCID, IDFV), device platform, and device manufacturer are used to generate a unique push target ID (CID) and device ID (GID) to ensure the accurate delivery of message push and accurate identification of message devices. The device brand, device model, and system version are used to optimize the effectiveness of channel resources and improve the arrival rate and stability of message push. In addition, to ensure the uniqueness of CIDs and improve the stability and accuracy of message push, you must authorize storage permissions (WRITE_EXTERNAL_STORAGE, READ_EXTERNAL_STORAGE) and device permissions (READ_PHONE_STATE).

(2) Application list information: We use merged link technology for technical push, when a device has multiple APP push links active at the same time, we will randomly merge into a link to achieve the purpose of saving power and traffic for users, so we need to obtain application list information; At the same time, we provide intelligent push function, through the information to recommend more in line with your users' needs of the push content, reduce the use of push information to your users disturbing, you can choose to turn on or off this service, but turning off this service will lead to increased power and data consumption.

(3) Network information and location-related information: In order to maintain the stability of the network connection to the greatest extent and establish a long link, we need to understand the network status and changes of the device, so as to achieve stable and continuous push service. We provide the push function in response to the scene, and the location-related information will help us provide you with refined push in offline scenarios, which can recommend push content that is more in line with the needs of your users, and reduce the interruption of useless push messages to your users.

(4) In order to ensure the timeliness of your receipt of messages, when you use the message push service, you can authorize us to adjust the link and mutually promote the closed SDK push process, so as to ensure the effective reach of push messages.

In order to ensure the stable operation and functional realization of our push services, and enable you to use and enjoy more functions and services, our services will access software development kits (SDKs) and application program interfaces (APIs) provided by partners

[1] Software development kits (SDKs) and application programming interfaces (APIs) that we obtain information from our partners

[2] Conduct strict security testing and agree with partners on strict data protection measures to process personal information in accordance with this Policy and any other relevant confidentiality and security measures. The details of our access partners are as follows, we recommend that you read the relevant privacy policy:

SDK name: Zhuoxin ID

Information involved: weak characteristics of the device (characteristics that do not have uniqueness and stability): device information (device manufacturer, device model, device system information), device network information (device networking mode and status information), device environment information (screen brightness, battery status and country, device application information (installation information such as versions of common applications of the device)

Purpose of use: Provide equipment identification and security risk control services

Partner: China Academy of Information and Communications Technology

Collection method: SDK collection

Link to the official website of the partner: <https://zxid.caict.ac.cn>

Partner Privacy Policy Link: <https://zxid.caict.ac.cn/privacy>

Privacy Policy: <https://docs.getui.com/privacy>

2 How Such Information Is Used by This System

1. When you log in, retrieve a password, or edit personal settings, you need to provide your personal information, including your user name, password, avatar, phone number, and email address.
2. When you use the personnel management function, you need to enter the personal information of the person, including the user name, password, avatar, phone number, and email address for follow-up management.
3. When you use the plant management function, you need to enter the name and phone number of the plant contact, and the plant address and its longitude and latitude. After devices in the plant are connected, the ESN, registration code, SIM card number, current, voltage, power, energy yield, temperature, and alarm of the devices will be collected for your follow-up management.

3 Whether This System Discloses Your Personal Information

Unless for the following purposes or compliance with applicable laws, this system will not sell, rent, or transfer your personal data in any other way to third parties without your explicit consent.

We may access, disclose, and store your personal data to the extent that it is lawful for the following purposes:

1. Disclose your personal data to third parties who provide services to you, such as third parties who manage and maintain your inverters.
2. Comply with applicable laws or respond to effective legal processes of authorities (including law enforcement agencies and other government agencies).
3. Protect the security and availability of Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş. information communication system, for example, prevent spam or fraud or help avoid any loss of life, personal injury, or serious damages, and prevent or stop attacks to Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş. computer system or network.
4. Protect Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş. intellectual property rights, information assets, and other property and rights.
5. As a global company, we may share personal information among Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş.'s Data Co., Ltd. and its affiliates. However, we only disclose the necessary information based on this Privacy Statement.

4 How This System Protects and Retains Your Personal Information

To ensure your information security, we use all kinds of physical, management, and technical measures that meet the industry standards to protect your personal data from unauthorized access, disclosure, use, modification, damage, or loss. For example, we use cryptographic technologies for data confidentiality, protection mechanisms to prevent attacks, and access control mechanisms to permit only authorized access to your personal data. We also provide training on security and privacy protection for employees to raise their awareness of personal data protection. Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş. is committed to protecting your personal data; however, please note that no security measure is perfect.

We will retain your personal information for no longer than is necessary for the purposes stated in this Privacy Statement, unless otherwise extending the retention period is required or permitted by law. The data storage period may vary with scenario, product, and service. The standards Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş. uses to determine the retention period are as follows: the time required to retain personal data to fulfill business purposes, including providing products and services; maintaining corresponding transaction and business records; controlling and improving the performance and quality of products and services; ensuring the security of systems, products, and services; handling possible user queries or complaints and locating problems; whether the user agrees to a longer retention period; and whether the laws and contracts have special requirements for data retention; etc. We will maintain your registration information as long as your account is necessary for service provision. You can choose to deregister your account. After you deregister your account, we will stop providing you with products and services through your account and delete your relevant personal data.

Information	Purpose of Processing	Retention Period
<p>Registration data and login data. Your name, nickname, telephone number, area, and e-mail address used to register for an App account.</p> <p>Legal basis (relevant jurisdictions only): Necessary to perform our contract with you to create your App profile and provide App services.</p>	<p>Set up your App account and help you log in;</p> <ul style="list-style-type: none">- Helping you to use the App functions;- To enforce our terms, conditions and policies;- Corresponding with you and notifying you of App changes;- Developing new	<p>Registration data is retained until your account is deleted.</p> <p>Log in data is retained for a period of 3 months from the date of such log in.</p>

	<p>services and improving existing services;</p> <ul style="list-style-type: none"> - Providing language and location customization; - Protecting any rights, property or safety of us, our affiliates or other App users; - Manage the App and use it for internal operations, including troubleshooting, data analysis, testing, research, security, fraud detection, account management, and investigative purposes. 	
<p>Shared data-personal profile data. Any information contained in your publicly visible App profile, which may include your name, gender, area, and photo.</p> <p>Legal basis (relevant jurisdictions only): Necessary to perform our contract with you to create your App profile and provide App services.</p>	<p>Helping you to use the App functions;</p> <p>Providing language and location customization;</p> <p>developing new services and improving the experience of existing services and applications;</p> <p>maintaining and managing the platform; and for troubleshooting, data analysis, testing, research, security, fraud detection, and account management.</p>	<p>Until you request removal of the Shared Information or your account is deleted, whichever is earlier (however, the data may be cached on third party services and retained in accordance with their own privacy policies).</p>
<p>Additional account security information (if you choose to protect your account). Password, managed devices, e-mail address.</p> <p>Legal basis (relevant jurisdictions only): Necessary to perform our contract with you to create your App profile and provide App services.</p>	<p>Extra protection for your account.</p>	<p>Until you request removal of the information or your account is deleted, whichever is earlier.</p>
Plant device data. Device	Provide our	After 3 months from the

<p>information for the plants, inverters and collectors that you create on the platform. We do not keep the device data permanently on our servers, but only transmit this information through our servers, and process the necessary logic so that it can be distributed to the intended recipient devices of your device data for viewing.</p>	<p>communication services.</p>	<p>date of deletion of the device, it is permanently deleted.</p>
<p>Location data is derived from your GPS (GPS coordinates).</p> <p>Legal basis (relevant jurisdictions only): Necessary to perform our contract with you to create your App profile and provide App services.</p> <p>Please note that if you use location-based services, you are subject to the terms of use and privacy policies established by the third-party service providers of location-based services (such as Foursquare) that support such services.</p>	<p>Facilitate your use of location-based services, such as:</p> <ul style="list-style-type: none"> - Viewing the location information of a plant with the help of your GPS; - Manually tagging geographic locations or GPS location information when creating or editing a plant; - For security, fraud detection and account management; - Provide language and location customization. 	<p>Location data for location-based services:</p> <p>Location data used for plant will be retained for 3 months from the date of deletion of the plant and will be automatically deleted after 3 months.</p>

5 How This System Stores Your Personal Information

The personal information we collect and generate will be stored within the EU. We will retain your personal data within the time limit required for fulfilling the purpose of this Statement, and delete or anonymize your personal information after the retention period expires unless you may need to extend the retention period or be permitted by law as required by law.

If you no longer need to use our products (or services), please contact technical support engineer. We will delete your personal information or anonymize it after receiving your request.

In addition, if we discontinue our products (or services), we shall notify you in the form of a push notification, announcement, etc., and delete your personal information or anonymize it within a reasonable time period.

6 How You Can View and Update Your Personal Information

It is your responsibility to ensure that all personal data submitted to Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş. is correct. Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş. is dedicated to maintaining the accuracy and completeness of personal data and keeping the data up-to-date.

To the extent required by applicable law, you may

- (1) have the right to access certain personal data we maintain about you;
- (2) request that we update or correct inaccuracies in that data;
- (3) object to our use of your personal data;

To exercise these rights, please contact us through the contacts indicated in the following paragraph 9. Your written request may be required for security. We may decline the request if we have reasonable grounds to believe that the request is a fraudulent, unfeasible or may jeopardize the privacy of others.

You have the right to withdraw your consent at any time when Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş. processes your personal data based on your consent. However, withdrawal does not affect the legitimacy and effectiveness of how we process your personal data based on your consent before the withdrawal is made; nor does it affect any data processing based on another justification other than your consent.

If you think that the way we process your personal information does not comply with applicable data protection laws, you can contact the relevant competent data protection authority. You can obtain the information for contacting EU data protection authorities at http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

If you need to delete your personal information and cancel your account, you can click on the personal center in the APP, and then click on the profile picture, select the account cancellation for the account cancellation operation, and ensure that your power station has been completely deleted when canceling. Once you are logged out, you will no longer be able to log in to the platform using that account.

7 International Transfers of Your Personal Data

Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş. is a global company, which means that your personal data collected by Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş. may be processed or accessed in the country/region where you use our products and services or in other countries/regions where Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş. or its affiliates, subsidiaries, service providers, or business partners have a presence. These jurisdictions may

have different data protection laws. In such circumstances, Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş. will take measures to ensure that data is processed as required by this Statement and applicable laws. When transferring the data subject's personal data from the EU to a country or region which may not have an adequate level of data protection and have not been acknowledged by the EU, we may use a variety of legal mechanisms, such as signing standard contractual clauses approved by the EU Commission, obtaining the consent to the cross-border transfer of a data subject , or implementing security measures like anonymizing personal data before cross-border data transfer.

8 Updates to This Statement

We reserve the right to update this Statement at any time. When the Statement is updated, we will show you the latest Statement in a pop-up window for any changes. We will collect, use, and store your personal information according to the updated Statement only after your consent is obtained.

9 How to Contact Us

If you have any privacy complaints or issues, and want to contact Sirius Yenilenebilir Enerji Teknolojileri Üretim A.Ş.'s Data Protection Officer (DPO), please click here: <http://siriuspv.com>

Last updated: May 1, 2021

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