

Elli Mobility GmbH

Pre-contractual Transparency Information (EU Data Act) for Related Services – Art. 3 (3) Data Act (Fleet Charging & Charging Site Management)

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Regulation reference: Regulation (EU) 2023/2854 (Data Act) – Articles 3(3) (pre-contractual information)

This document provides you with the mandatory pre-contractual information required under Regulation (EU) 2023/2854 ("EU Data Act") for the use of **fleet charging and charging site management services provided by Elli Mobility GmbH (Elli)**.

i. **Fleet Charging:**

As a **Mobility Service Provider (MSP)**, Elli enables B2B users with car fleets to charge their electric vehicles at charging stations operated by various Charge Point Operators (CPOs) using Elli provided RFID cards or the Charge&Fuel card.

Fleet Charging provides several services to a fleet manager that the fleet manager can use under the Fleet Charging contract.

Following related services are relevant for EU Data Act:

Related services:

- Public Charging – This service provides fleets the capability to charge their electric vehicles at public charging stations connected to Elli's network partners. For more information see <https://www.elli.eco/de/geschaeftskunden/flotten-management/flotten>.
- Home Charging – This service provides fleets the capability to reimburse their drivers for charging energy used to charge the fleet cars at the driver's private charging infrastructure connected to Elli's backends. For more information see <https://www.elli.eco/de/geschaeftskunden/flotten-management/flotten>.

The data provision is only available once the user has created an account and has ordered charging cards.

ii. Charging Site Management:

Elli supports B2B charging infrastructure owners (CPOs) in their effort to manage that infrastructure, offer diverse charging options to EV drivers and balance energy consumption of their charging infrastructure. To provide those services, Elli operates a charging station management system and provides frontends to CPOs to manage the charging infrastructure and Elli provided connected services.

Charging Site Management provides several services to a CPO in a package defined by the concrete contract the CPO holds with Elli. Following related services are relevant for EU Data Act:

Related services:

- Basic Operational Services: This service enables the CPO to connect and manage charging infrastructure, enable charging at the charging infrastructure in several usage scenarios, monitor and analyse charging infrastructure usage.
- Marketing, Selling and Invoicing charging sessions: This service enables the CPO to easily earn money via allowing Elli managed marketing, selling and invoicing of charging sessions at the CPO's charging infrastructure.

The data provision is only available once the user has created an account and subscribed to a charging site management service.

1) Role of Elli Mobility GmbH and data sources

i. Fleet Charging:

Elli Mobility GmbH provides related services. These services include enabling fleets to charge their vehicles at public charging stations via contracts with multiple CPOs. The CPO operates the charging station as a connected product and is the data holder of the product data generated by the charging station. After each charging session, Elli receives a *Charge Detail Record (CDR)* from the relevant charging station / CPO. This CDR contains information necessary for billing purposes, displaying your charging history in the relevant apps, and providing customer support.

The related services also include enabling the user to charge fleet cars at privately owned home wallboxes that are connected to an Elli backend to see those charging sessions in the Fleet console and to be able to reimburse the (usually) employee the energy used for charging that fleet car. Similar to charging at public charging stations, Elli receives charging details from the connected wallbox via an Elli backend and creates a CDR that is used for display in the Fleet Management Console, the frontend for the user to manage the fleet charging service.

For detailed information about data processing, please refer to the privacy notes within the services.

ii. **Charging Site Management:**

Elli Mobility GmbH provides related services. These services include services to manage charging infrastructure connected to Elli's charging station management system (backend). The owners of the charging infrastructure are users of those services according to the EU Data Act. The users operate the charging infrastructure as a connected product and provide via the connection to Elli's charging station management system charging session data as well as other charging station data to Elli which is then used to provide the Charging Site Management services. Therefore, the CPO is the data holder of the GDPR-relevant data and Elli is the data holder of the non-GDPR-relevant data that is sent to the backend. At the initiation of a charging station, Elli receives data to be checked for authorizing the charging session from the charging station. After each charging session, Elli receives charging data from the connected stations which is used by the backend to create a *Charge Detail Record (CDR)* for that charging station. This CDR contains information necessary for billing purposes, displaying your charging history in the relevant apps, and providing customer support.

For detailed information about data processing, please refer to the privacy notes within the service.

2) Nature, estimated volume of related service data & access including data storage arrangements and retention duration

Depending on factors such as use case, country of operation and user settings, different related services (such as apps, credit card terminals used and backend services) collect various types of related service data.

- i. **Fleet Charging:** Examples of data transferred to provide access to public charging in Fleet Charging
- B2B Account registration data (e.g., user country, name, email address, correspondence address, VAT ID, consents to legal documents (product terms of use, system user registration terms of use))
 - Subscription and tariff data (e.g., billing and shipping addresses, RFID card order, RFID card number, payment data, tariff information)
 - Charging session data (e.g., individual charging session data, timestamps, duration, location, energy delivered, invoice reference)
 - Invoicing and billing data (e.g., subscription start and end dates, CDR, gross amount, currency, tariff name, subscription period, base fee, invoice number, credit memo, tax ID)

- ii. **Charging Site Management**: Examples of data transferred to provide the related services to a CPO
- B2B Account registration data (e.g., user country, name, email address, correspondence address, VAT ID, consents to legal documents (product terms of use, system user registration terms of use))
 - Charging station identification and configuration data (e.g., charging station model, charging station manufacturer, serial number, authorization mode)
 - Charging session data (e.g., individual charging session data, authorization method, used RFID card, timestamps, duration, location, energy delivered, invoice reference)
 - Invoicing and billing data (e.g., subscription start and end dates, CDRs, gross amount, currency, prices, invoice number, credit memo, tax ID)

Elli Mobility GmbH processes the above data relating to **Fleet Charging and Charging Site Management** for the following purposes:

- Authenticating and enabling your charging sessions
- Billing and invoicing for completed sessions
- Compensate used energy for “external charging sessions”, i.e. completed charging sessions at the charging stations of the user sold by Elli’s related Marketing & Selling service
- Displaying your charging history in the in the relevant frontends provided by Elli
- Customer support and troubleshooting
- Improving our services
- Fulfilling the contract with the user

Consequently, it is not possible to specify the exact volume of related service data generated by each related service, as this varies depending on which services the user has selected and which features are included.

Related service data is stored on the device (e.g. a charging station) and is then provided to Elli in case of

- i. **Fleet Charging**
by the CPOs either after the charging session, or via MSP backends.
- ii. **Charging Site Management**
before, during, and after the charging session, or if requested by a related service via Elli’s backend.

These backends are remote storage solutions (servers or cloud-based systems) that may be provided by third parties to Elli. The retention duration of collected data depends on the type of data and the purpose of the use case. Once the purpose has been fulfilled and there are no retention obligations, the data will generally be deleted.

Data can be accessed and retrieved via the EU Data Act Portal. Designed for the brands of the Volkswagen Group, these self-service platforms are operated by Group Information Services AG to simplify and streamline data requests with minimal manual interaction. To initiate a data request, please visit the EU Data Act Portal and follow the steps outlined.

Please visit <https://www.elli.eco/en/eudataact> to find all relevant links and documentation.

3) Use of data holder, purposes & transfer of data to third parties

Data will only be processed on a legal basis in accordance with Article 6 of the EU General Data Protection Regulation (GDPR) and/or related privacy legislation, in order to fulfill our contractual obligations and provide our Fleet Charging and Charging Site services. Likewise, the use of non-personal data is based solely on the contractual agreement with the user pursuant to Art. 4(13)/4(14) DA.

Depending on the circumstances, Elli may use the data for their own purposes, for example to provide related services, for updates or product analysis, or for developing and or providing future services. Furthermore, Elli may share data or information with third parties for agreed-upon purposes and/or the legitimate interests of Elli. These purposes may include, but are not limited to, collaborations with technology partners to integrate advanced features, partnerships with research institutions to drive scientific advancements, and engagements with service providers to deliver seamless and efficient user experiences.

4) Data sharing request with third party & limitation/end of sharing

In line with the EU Data Act, Elli Mobility GmbH enables users to request the sharing of readily available data with a third party of their choice.

This data will be shared in a structured, commonly used, machine-readable format, using secure transfer methods.

Users can initiate and revoke sharing via the following web portal: <https://drivesomethinggreater.com/eu-data-act>.

Sharing is subject to technical feasibility and security requirements. Elli Mobility GmbH is not responsible for how the third parties use the received data. Users should review the terms and conditions, and privacy policies of any third parties involved.

Data formats / standards: JSON/CSV/XML (where applicable).

5) Lodge a complaint

You can file a complaint at any time in accordance with Art. 37 of the Data Act by contacting the relevant local authority. The relevant local authority will be designated by the government in question.

6) Trade secrets & trade secret holder

Elli Mobility GmbH applies industry-standard security controls, such as TLS (Transport Layer Security) for transit data, signed firmware and secure onboarding. Where data may contain Elli Mobility GmbH or supplier trade secrets (e.g., certain diagnostic parameters), Elli Mobility GmbH balances user access with protection measures as permitted by the Data Act.

7) Duration of the contract & arrangements for termination

i. Fleet Charging:

The user can end the contract by cancelling their auto-renewal subscription. The user has the option to terminate the contract immediately within 14 days of subscribing to a tariff. The contract can also be terminated immediately in the event of the user's death or if they move to another country.

ii. Charging Site Management:

Duration of the contract and arrangements for termination depend on the concrete subscription contract between Elli and the user. Using a typical contract, the user can terminate the contract after 2 years with a 3 month notice period. If the contract is not terminated, the contract automatically extends for another year until it is terminated with the 3 months notice period.

8) Contact Information

Prospective data holder / manufacturer:

Elli Mobility GmbH
Karl-Liebknecht-Str. 32
10178 Berlin
Germany

Support: ellimobility@elli.eco

Competent authorities: Each EU Member State designates Data Act authorities. Users may lodge complaints in their habitual residence/place of work/establishment.