

# **KOSTAL Solar Terminal privacy policy**

KOSTAL Solar Electric GmbH, Hanferstr. 6, 79108 Freiburg, Germany ("KOSTAL"), is one of the leading solar power companies in Germany.

Supplier of innovative inverters and storage systems for private and commercial photovoltaic systems. It also offers its customers various service applications for simple monitoring, expansion and control of photovoltaic systems (e.g. KOSTAL Solar Portal, KOSTAL Webshop, KOSTAL Solar Plan). To simplify login and registration for the various services, KOSTAL offers one-time registration in the KOSTAL Solar Terminal using the Terminal ID. As a user of the Terminal ID, you have the right to know how KOSTAL processes your personal data.

## **1. KOSTAL respects your privacy**

KOSTAL is pleased that you have decided to use the KOSTAL Solar Terminal and register with a Terminal ID.

The protection of your privacy when processing personal data and the security of all business data is an important concern for us, which we take into account in our business processes. We process personal data that is generated when using the Terminal ID confidentially and only in accordance with the statutory provisions.

Data protection and information security are part of our corporate policy.

## **2. Responsible person**

KOSTAL is responsible for providing the Solar Terminal and the Terminal ID. In this context, your data is collected and processed by KOSTAL and transmitted to the applications you use for the purpose of logging in.

Our contact details are as follows:

**KOSTAL Solar Electric GmbH, Hanferstr. 6, 79108 Freiburg, Germany, [info-solar@kostal.com](mailto:info-solar@kostal.com),**

**Phone: +49 761 47744-100.**

The use of the Terminal ID, in particular the maintenance of your master data and the provision of an overview of your applications, is carried out in accordance with the provisions of the General Data Protection Regulation.

## **3. Data processing**

### **3.1 General information**

Personal data is any information relating to an identified or identifiable natural person, such as names, addresses, telephone numbers, e-mail addresses, photos or other information that expresses the identity of a person.

We only collect, process and use personal data (including IP addresses), if there is a legal basis for this or if you have given us your consent to do so, e.g. as part of a registration.

### **3.2 Legal basis and purpose**

Personal data is only processed for the purposes listed below.

### **3.3 Registration and login with the terminal ID**

For the provision of the terminal ID (registration and login), your data will be processed in accordance with the terms of use and contractual conditions of the service you are using. (KOSTAL Solar Terminal Terms of Use). The following data is collected and processed by us for this purpose: User ID (e-mail address or mobile phone number), first name, surname, language, country and a password of your choice.

If individual service applications require further information such as payment data, VAT ID or similar to fulfill the purpose of the contract, you will be informed of this separately.

As part of the registration process, we also record your consent to our Terms of use or acknowledgement of this privacy policy with name and time.

The legal basis for the processing is Art. 6 para 1 lit b GDPR, the fulfillment of the contract (terms of use).

### **3.4 Master data maintenance with the terminal ID in the KOSTAL Solar Terminal**

The Terminal ID makes it easier for you to repeatedly enter and maintain your master data in the integrated service applications. Data stored during registration

(e-mail address, mobile phone number, first name, surname, language and country) can be maintained independently in your user account and kept up to date at all times. For this purpose, the data is processed and, if necessary, shared with the integrated service applications.

We also provide you with an overview of the applications linked or linkable to your Terminal ID.

The legal basis for the processing is Art. 6 para 1 lit b GDPR, the fulfillment of the contract (terms of use).

### **3.5 Investigation of service disruptions and for security reasons**

We also process your data in order to fulfill our legal obligations in the area of data security and our contractual obligations.

The legal basis for the processing is Art. 6 1 lit b GDPR, the fulfillment of the contract (Terms of Use) or Art. 6 para 1 lit c GDPR for the fulfillment of legal obligations.

### **3.6 Safeguarding and defending our rights**

In addition, we process the data if we have a legitimate interest, such as maintaining the function of the service applications or our rights

The legal basis for the processing is Art. 6 para 1 lit f GDPR.

### **3.7 Collection of data from PV systems**

In order to ensure convenient, reliable and free monitoring of your PV system and the performance data of your inverter worldwide and to transmit the results satisfactorily, it is necessary to provide the

registration data (surname, first name, e-mail address, country, language, company name, KOSTAL customer number) as well as the

Inverter data (type no., serial number and information about the system (name, owner, description, location, zip code, time zone, installation, remuneration, electricity purchase costs, data transmission, events, yields, consumption, voltages) required.

The legal basis for the processing is the consent you have given (Art. 6 para. 1 it a) GDPR). There is no obligation to provide the data, however, the use of the integrated service applications may then not be fully possible.

#### **4. Log files**

Every time you use the Internet, certain information is automatically transmitted by your Internet browser or mobile device and stored by us in so-called log files. Without the provision of this information, we cannot provide the website content you have accessed

The log files are used by us to protect our IT infrastructure (e.g. to investigate attack attempts) or to investigate malfunctions for a period of thirty (30) days. In the event of a security-relevant event (e.g. an attack), we store the log files beyond this period until the security-relevant event has been eliminated and fully clarified. In individual cases, the data may also be passed on to investigating authorities.

In particular, the following information is stored in the log files:

- IP address (Internet Protocol II address) of the terminal device from which the terminal ID is accessed;
- Internet address of the website from which the online offer was accessed (so-called origin or referrer URL);
- Name of the service provider used to access the online offer;
- Name of the files or information retrieved;\_- date and time and duration of the retrieval;\_- amount of data transferred;
- Operating system and information on the Internet browser used, including installed add-ons (e.g. for Flash Player);\_- http status code (e.g. "request successful" or "requested file not found")

#### **5. Analysis (Google Analytics 4)**

Provided you have given your consent, the KOSTAL Terminal website uses the web analysis service Google Analytics 4, which is offered for persons from Europe, the Middle East and Africa (EMEA) by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland and for all other persons by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google Analytics 4 is integrated via the Google Tag Manager. If you have not consented to the use of the analysis tools, your data will not be collected by Google Analytics 4.

Google Analytics 4 uses JavaScript and pixels to read information on your end device, as well as cookies to store information on your end device. This is used to analyze your usage behavior and to improve our KOSTAL Terminal website. The access data is summarized by Google on our behalf into pseudonymous user profiles and transmitted to a Google server in the USA. We will process the information obtained in order to evaluate your use of the website and to compile reports on website activity.

As part of the evaluation, Google Analytics 4 also uses artificial intelligence such as machine learning for the automated analysis and enrichment of data. For example, Google Analytics 4 models conversions if there is not enough data available to optimize the analysis and reports. Information on this can be found in the corresponding [Google documentation](#). Data analysis is automated with the help of artificial intelligence or based on specific, individually defined criteria. You can find more information on this in the associated [Google documentation](#).

The data collected as part of the usage analysis of Google Analytics 4 is enriched with data from the Google Search Console and linked to the data from Google Ads, in particular to measure the success of our advertising campaigns (so-called conversions).

Processed data: The following data may be processed by Google Analytics 4:

- IP address;
- User ID and device ID;
- Referrer URL (previously visited page);
- Pages accessed (date, time, URL, title, duration of visit);
- downloaded files;
- clicked links to other websites;
- Achievement of specific goals (conversions);
- technical information (operating system; browser type, version and language; device type, brand, model and resolution);
- approximate location (country, region and, if applicable, city, based on anonymized IP address).

Data protection settings: We have made the following data protection settings for Google Analytics 4:

- Anonymization of the IP address;
- deactivated advertising function;
- deactivated personalized advertising;
- deactivated remarketing;
- Retention period of 2 months (and no resetting of the retention period for new activity);
- deactivated cross-device and cross-page tracking (Google Signals);
- deactivated data sharing (especially Google products and services, benchmarking, technical support, account specialist).

We have concluded a data processing agreement with Google Ireland Limited for the use of Google Analytics 4. In the event that personal data is transferred from Google Ireland Limited to the USA, Google Ireland Limited and Google LLC have concluded standard contractual clauses (Implementing

Decision (EU) 2021/914, Module 3) in accordance with Art. 46 para. 2 lit. c GDPR. In addition, we also obtain your express consent for the transfer of your data to third countries in accordance with Art. 49 para. 1 lit. a GDPR.

Further information on Google Analytics 4 can be found in Google's [privacy policy](#) and in the [Google Analytics privacy policy](#). Further information on the cookies used by Google Analytics 4 can also be found in [Google's documentation](#).

## **6. Minors**

You must be of legal age to register a Terminal ID.

## **7. Disclosure of data**

### **7.1 Disclosure of data to other controllers (general).**

Your personal data will only be transferred by us to other companies to the extent necessary for the respective purpose and only if there is a basis for the transfer. Furthermore, data may be transferred to other controllers if we are obliged to do so by law or by enforceable official or court order and if we or third parties have a legitimate interest in the transfer. Details on the legal bases can be found in the section Purposes of processing and legal bases. If data is transferred to third parties on the basis of a legitimate interest, this is explained in this data protection notice.

### **7.2 Service providers (general)**

We may commission external service providers with tasks such as sales and marketing services, Contract management, programming, data hosting and hotline services. We have these  
We carefully select our service providers and regularly monitor them, in particular their careful handling and protection of the data stored with them. All service providers are obliged by us to maintain confidentiality and to comply with legal requirements and act for us as processors.

### **7.3 Transfer to recipients in third countries**

We also do not pass on personal data to recipients based outside the EEA in so-called third countries.

## **8. Duration of storage; retention periods**

In principle, the data collected by us is stored for as long as is necessary to provide our services or for as long as we have a legitimate interest. In all other cases, we delete the personal data, unless storage is mandatory to fulfill legal obligations (e.g. tax and commercial law), if you delete your registration in the KOSTAL Solar Terminal:

## **9. Use of cookies**

When you use our website, we store cookies in the browser of your end device, unless you prohibit this by making the appropriate settings in your browser.

The use of the Terminal ID is generally possible without cookies that do not serve technical purposes

.

## 9.1 General information on cookies

Cookies are small text files with information that are stored on your computer when you visit a website. browser can be placed on the user's end device. When the website is called up again with the same end device, the cookie and the information stored in it can be read.

A basic distinction is made between (i) first-party and third-party cookies, (ii) transient and persistent cookies and (iii) cookies that do not require consent and cookies that require consent.

First-party cookies are cookies that are set by us or by a processor commissioned by us. Third-party cookies, on the other hand, are cookies that are set and accessed by another controller.

Transient cookies are deleted when you close your browser. Persistent cookies, on the other hand, are cookies that are stored on your end device for a certain period of time.

Cookies that do not require consent are those whose sole purpose is to carry out the transmission of a message via an electronic communications network. Cookies that are absolutely necessary for the provider of a service to provide the service are also consent-free. information company that has been expressly requested by the subscriber or user can provide this service (also known as strictly necessary cookies). All other cookies require consent.

## 9.2 Management of cookies

If the user's consent is required for the use of certain cookies, we will only use these cookies when you use the KOSTAL Solar Terminal if you have previously given your consent to this.

When you call up the KOSTAL Solar Terminal, we display a so-called "cookie banner" in which you can give your consent to the use of cookies on this website by clicking on a button.

By pressing the button provided for this purpose, you have the option of consenting to the use of all cookies requiring consent or revoking your consent to the cookie settings at any time.

We also store your consent and, if applicable, your individual selection of cookies requiring consent in the form of another cookie ("opt-in cookie") on your end device in order to determine whether you have already given your consent when you call up the KOSTAL Solar Terminal again. The opt-in cookie has a limited validity period of one (1) month.

Strictly necessary cookies cannot be deactivated via the cookie management function. However, you can generally deactivate these cookies in your browser at any time.

You can also manage the use of cookies in your browser settings.

Different browsers offer different ways to configure the cookie settings in the browser. Further detailed information on this can be found, for example, at

<http://www.allaboutcookies.org/ge/cookies-verwalten/>

If you deactivate the storage of cookies in your browser, some functions of the KOSTAL Solar Terminal and/or the service applications may not work or may no longer work properly .

## 9.3 Cookies used on this website

a) Name: ai\_session

Purpose and content: When visiting the website, each visitor is assigned an individual ID for the duration of the visit. Your entries and your behavior on the website are assigned to this ID by our web server. For example, it is possible to assign your entries to your person while you navigate through the website

Responsibility: FirstParty

Validity: Session

Need for consent: no

Permission under data protection law: balancing of interests (Art. 6 Para. 1 S. 1 lit. f GDPR). Our legitimate interest is the provision of the informational function of the website accessed by the user.

b) Designation: ai\_user

Purpose and content: The cookie is used to collect statistical usage and Collect telemetry data. Cookie for the unique user ID to count the number of users accessing an application over time.

Responsibility: First Party

Validity: Session

Need for consent: no

Permission under data protection law: balancing of interests (Art. 6 para. 1 p. 1 lit. f GDPR). Our legitimate interest is the provision of the informational function of the website accessed by the user.

c) Designation: x-ms- cpim-CsrF

Purpose and content: Cookie is used as a token to prevent cross-site counterfeiting.

Responsibility: First party

Validity: Session

Need for consent: no

Permission under data protection law: balancing of interests (Art. 6 (1) S. 1 lit f GDPR). Our legitimate interest is the provision and protection of the website.

d) Designation: x-ms-cpim-sso

Purpose and content: Cookie is used to maintain the SSO session

Responsibility: First party

Validity: Session

Need for consent: no

Permission under data protection law: balancing of interests (Art. 6 para. 1 sentence 1 lit. f GDPR). Our legitimate interest is the provision of the informational function of the website accessed by the user.

e) Designation: \_ga

Purpose and content: For use with Google Analytics and Google Analytics 4 (see section 5), serves to distinguish users by means of an assigned ID.

Responsibility: First party

Validity: persistent (2 years)

Need for consent: yes

Permission under data protection law: Consent (Art. 6 para. 1 sentence 1 lit. a GDPR).

f) Designation: `_gid`

Purpose and content: For use with Google Analytics and Google Analytics 4 (see section 5), serves to distinguish users by means of an assigned ID

Responsibility: First party

Validity: persistent (24 hours)

Need for consent: yes

Permission under data protection law: Consent (Art. 6 para. 1 sentence 1 lit. a GDPR).

g) Name: `cookieconsent_status`

Purpose and content: Absolutely necessary opt-in cookie (see section II above) to store your consent and, if applicable, your individual selection for the use of cookies on your end device in order to determine whether you have already given your consent when you visit the website again

Responsibility: First party

Validity: persistent (1 month)

Need for consent: no

Permission under data protection law: balancing of interests (Art. 6 para. 1 sentence 1 lit. f GDPR). Our legitimate interest is the management of the cookie consents granted by the user for this website.

## 10. Safety

Both our employees and the service companies commissioned by us are obligated to  
Committed to confidentiality and compliance with data protection regulations.

We take all necessary technical and organizational measures to ensure an appropriate level of protection and to protect your data managed by us, in particular against the risks of accidental or unlawful destruction, manipulation, loss, alteration or unauthorized disclosure or access. Our security measures are constantly being improved in line with technological developments.

## 11. Rights of the users

Please use the information in the Contact section to assert your rights. Please ensure that we are able to clearly identify you personally.

As a data subject, you have the following rights in relation to the processing of your personal data:



- A right to information (Art. 15 GDPR) about which of your personal data we process. This includes further information about the data processing, such as the purpose and legal basis as well as the recipients of this data. You also have the right to request a copy of this data.
- The right to obtain from us the rectification of inaccurate personal data concerning you and the right to request the completion of incomplete personal data (Art. 16 GDPR).
- A right to request the deletion of personal data concerning you in the cases provided for by law (Art. 17 GDPR), for example if the data is no longer required for the purposes for which it was collected or if it has been processed unlawfully.
- A right to request the restriction of processing in the cases prescribed by law (Art. 18 GDPR).
- A right to receive the personal data concerning you, which we process on the basis of consent given or for the performance of a contract, in a structured, commonly used and machine-readable format (right to data portability, Art. 20 GDPR).
- A right to withdraw consent given to us at any time. This does not affect the lawfulness of the processing carried out prior to the withdrawal.
- A right to lodge a complaint with a supervisory authority (Art. 77 GDPR). A list of data protection supervisory authorities with their addresses can be found [here](#).

#### **Right of objection**

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on point (f) of Article 6(1) GDPR. We will then no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the establishment, exercise or defense of legal claims.

You are not necessarily entitled to the above rights without restriction in every case. The law provides for restrictions in each case. The full scope of your rights can be found in the above-mentioned articles, which you can access via the following link:

<http://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32016R067>

## **12. Objection to direct marketing**

You can also object to the processing of your personal data for advertising purposes at any time ("advertising objection"). However, we would like to point out that we do not carry out any direct marketing within the framework of the KOSTAL Solar Terminal and the Terminal ID.

## **13. Deregistration**

You can terminate the KOSTAL Solar Terminal user contract at any time by deregistering. Please note that deregistration only leads to the deletion of data for which there are no statutory retention periods.

When logging out of KOSTAL Solar Terminal, a deletion request is sent to the integrated service applications. The decision to delete the data stored in the service applications is the responsibility of the service applications themselves.

## **14. Contact**

If you would like to contact us, you can reach us at the address given in the "Controller" section.

To assert your rights and for suggestions and complaints regarding the processing of your personal data and to withdraw your consent, we recommend that you contact our data protection officer:

**Data Protection Officer of the KOSTAL Group**, An der Bellmerlei 10, 58513 Lüdenscheid,  
[datenschutz@kostal.com](mailto:datenschutz@kostal.com).

Freiburg, 01.06.2024