

# Principles of Elektrilevi Customer Data Processing

Valid from January 1, 2024

Elektrilevi (registry code 11050857) as responsible processor of customer data has its registered office at Veskiposti 2, Tallinn 10138.

The processing of Elektrilevi customer data is based on Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and repealing Directive 96/95/46/EC (General Data Protection Regulation), which is also often referred to in English as GDPR and other relevant legislation.

Elektrilevi also follows the guidelines and instructions of Data Protection Inspectorate and European Union Data Protection Expert Group WP29.

These policies are general, additional and/or clarifying terms and privacy notices may also be included in contracts, documents, forms, and on Elektrilevi website [www.elektrilevi.ee](http://www.elektrilevi.ee)

If the customer finds that their data is not processed in accordance with the applicable rules, he or she may contact Elektrilevi Data Protection Officer at [andmekaitse@elektrilevi.ee](mailto:andmekaitse@elektrilevi.ee). This option does not affect the client's statutory right of recourse to the Data Protection Inspectorate of the data protection supervisory authority or to the courts.

## 1. DEFINITIONS

Elektrilevi uses the terms as defined in the General Data Protection Regulation [here](#)

Customer is a natural person who has entered into a contract with Elektrilevi or has provided their data and has expressed their wish to register as a customer or to receive an offer from Elektrilevi for the conclusion of a contract, but has not entered into a contract. Elektrilevi also treats the owner of an immovable with an obligation to tolerate utility networks and facilities as a client.

Customer Data is all the information about Elektrilevi's Customer that enables the Customer to be identified, distinguished, associated or inferred, directly or indirectly. Processing of customer data is any action taken with customer data.

We use up-to-date physical, organizational and IT security measures to ensure the secure processing of data. These include protection of employees, IT infrastructure as well as office buildings and technical equipment. The purpose of the implementation of the measures is, above all, the prevention of hazards and the mitigation of risks. In order to ensure compliance with the measures, the internal procedures of the company and the Group are in place for mandatory compliance.

## 2. TYPES OF CUSTOMER DATA AND PURPOSES OF PROCESSING

### 2.1 Basic and contact information

Primary and contact details include, in particular, name, personal identification code, postal address, e-mail address, telephone number, and may include the language of communication, country of origin, non-resident's foreign identity number, identity number, date of birth. The Customer's basic and contact information is processed by Elektrilevi for communication with the Customer, for the purposes of the Agreement and for the performance of the Agreement.

Elektrilevi also processes via the Data Exchange Platform (AVP) according to the measurement point in the Electricity Market Act and and the EICs codes assigned to the individual for the purpose of automating the exchange of information.

Elektrilevi sends outage notifications to the customer via electronic contact data. For more information [see here](#)

### 2.2 Network and subscription details

Network and connection contract data Network and connection contract data include data that Elektrilevi processes for the purposes of entering into, amending and terminating the contract pursuant to the [Electricity Market Act](#) and the [network code](#) established on the basis thereof.

### 2.3 Point of consumption data

The point of consumption data characterizes the point of consumption of the client, including in particular the address, name and type of point of consumption, the location of the connection and measuring point and the technical data.

If a customer produces electricity in addition to consuming electricity, Elektrilevi processes their data as a connected manufacturer for the purposes and to the extent provided by the Electricity Market Act and the network rules established on the basis thereof.

### 2.4 Consumption data

Elektrilevi processes customer metering data for billing purposes. Measurement data is mainly collected by means of a remote meter. Consumption data is forwarded to AVP under Elektrilevi Electricity Market Act and Network Code, which can be accessed and seen in more detail [here](#)

Consumption data also includes consumption monitoring data that Elektrilevi processes in order to determine the causes of losses, which may be different types of malfunctions or illegal consumption.

When searching for causes of loss, Elektrilevi processes customer consumption data, history of previous loss(es) of persons and/or unauthorized electricity or network service, consumption location data, plot layout and views of Elektrilevi equipment, measurement of total flow and flow through the meter, network and subscription information. In the event of a malfunction or illegal consumption causing the loss, Elektrilevi shall prepare a statement of the situation.

When detecting unlawful use of electricity and network services, Elektrilevi processes personal data in the preparation of the Act and in calculating the amount of illegally used electricity and network service in accordance with the Government Regulation laying down the procedure for determining the amount of illegally used electricity and network services. The regulation itself is available [here](#). Elektrilevi processes personal data in accordance with the [network code](#) when preparing a report on the loss caused by a malfunction.

### 2.5 Billing and debt details

If the customer's electricity seller has entered into an agreement with Elektrilevi for the submission of a joint invoice, Elektrilevi's network service invoice data will be transmitted to AVP and the customer's electricity seller will prepare and submit an invoice to the customer. In

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this case, the customer's electricity seller also processes the debt data. If Elektrilevi does not have a joint invoice agreement with the customer's electricity seller, Elektrilevi's authorized processor will process the customer's network service invoice data and bill the customer. Read more [here](#).

## 2.6 Different types of personal data

Elektrilevi also processes to a limited extent, based on legitimate interest, different types of personal data of customers. If customers themselves disclose their personal data of various types (e.g. health status, unemployment, etc.) during the referral, Elektrilevi will only use it for solving the referral.

## 2.7 Authorizations and contacts provided by the Customer

Elektrilevi shall process the Customer's authorized persons and designated contact persons within the scope of the authorization for issues related to the performance of the contract.

## 2.8 Claims data

Claim data will be processed by Elektrilevi on the basis of a client application for the purpose of deciding on claims and compensation. Claim data include, in particular, a description of the damage, an act of defect, an estimate of the amount of the damage, cost records, and, where appropriate, billing information. For more information [see here](#).

## 2.9 Communication details

**2.9.1** In Elektrilevi buildings and customer service, security cameras are used to protect persons and property. The collected data is processed by Elektrilevi. Access to video recordings is restricted to persons related to the security management of Elektrilevi.

**2.9.2** Calls made to Elektrilevi's customer telephone 777 1545, Elektrilevi's business customer's telephone 777 1747 and Elektrilevi's emergency telephone 1343 are recorded. The main purpose of data processing is to provide the customer with the fastest and easiest possible service. The voice recordings are processed by Elektrilevi.

**2.9.3** When calling a 1343 hotline, the Elektrilevi county base number identifies the region of the origin of the call and uses this information to inform the customer by voice message about malfunctions and interruptions known to Elektrilevi in that area.

**2.9.4** Calls to the hotline are handled by a limited number of Elektrilevi employees with the aim of conducting a fact-finding investigation of the incoming hint and, if necessary, prosecuting illegal consumption. The personal details of the caller are not specified, they are processed only if they themselves provide it.

**2.9.5** Electronic and paper correspondence with the customer is processed by Elektrilevi for the purpose of solving customer inquiries.

**2.9.6** Elektrilevi maintains a history of customer calls with the aim of providing a comprehensive service to the customer.

**2.9.7** Elektrilevi uses cookies on its website to remember customer's settings and preferences, and to make browsing the website more convenient. Elektrilevi does not use cookies to identify a person.

## 3. LEGITIMATE INTEREST

**3.1** In certain cases, Elektrilevi also processes customer data for its own legitimate interests. Elektrilevi has a legitimate interest in having a commercial interest in which the processing of customer data is justified and necessary and which outweighs any potential infringement of the customer's rights to the protection of personal data that may result from such processing. As part of a legitimate interest, Elektrilevi processes customer data for purposes such as:

**3.1.1** Forwarding of periodic newsletters incl. for the purpose of introducing our customers to additional services and offers. Newsletters can be unsubscribed by the customer at any time without giving any reason.

**3.1.2** Improving the user experience through customer feedback on services and processes and generating statistics and surveys through it. Feedback is optional for the client.

**3.1.3** Improvement and further development of Elektrilevi's technical systems, self-service environment and IT systems, incl. resolving security incidents.

## 4. CONSENT

In certain cases, Elektrilevi will also ask for separate consent from the customer for the processing of customer data. When requesting consent, Elektrilevi will explain the purpose of seeking consent and provide information on the intended processing. The customer can give and withdraw their consent without giving any reasons. Based on the Customer's consent, Elektrilevi will, for example, make personal offers to its customers or forward customer data to Elektrilevi's partners for the purposes described in the consent request.

## 5. AUTOMATED DATA PROCESSING, INCL. PROFILE ANALYSES

Elektrilevi uses automated data processing and profile analysis for the following purposes:

**5.1** Based on the type of consumption location, the nature of consumption and the annual amount of electricity consumed, Elektrilevi assigns a typical consumption schedule to the customer's place of consumption. Based on the typical consumption graph and the customer's last 12 months' consumption data, Elektrilevi forecasts the amount of electricity in cases where the meter does not receive actual readings. For more information on how to prepare a Forecast Invoice and related issues see [here](#).

**5.2** The customer's annual consumption and the percentage of the daily consumption rate are the basis for Elektrilevi's recommendations for choosing the network package.

**5.3** The amount of electricity consumed during the previous calendar year, in particular the lack of consumption or the amount consumed below 250kWh, shall be the basis for determining the fixed charge for the electricity network service.

# Principles of Elektrilevi Customer Data Processing

Valid from January 1, 2024

## 6. CUSTOMERS RIGHTS IN RELATION TO PERSONAL DATA

### 6.1 Right of access to your data

The most convenient way for a customer to access their basic and contact data, contract details, place of consumption and consumption data is through Elektrilevi self-service environment, as well as information from customer service.

### 6.2 Right to rectify personal data

**6.3** The Customer has the right to correct their data if it is not correct or complete. If the customer's basic and contact information has changed or if the customer discovers that their details are incorrect, they have always the right (subject to the standard terms and conditions of the contract) to correct them either at self-service or customer service.

Customers can also contact Elektrilevi if they wish to specify or correct their consumption data, in particular the quantities estimated by means of a remote meter and the bill based on it.

### 6.4 The right to be forgotten

In some cases, the customer has the right to have their personal data deleted. This right does not apply in the situation where Elektrilevi processes personal data of the customer in order to fulfil its obligations under the Electricity Market Act, the Grid Code or other legislation. The client must also bear in mind that if they wish to be forgotten, it will not be possible to continue to receive services under the contract.

### 6.5 Right to object

The Customer shall have the right at any time to object to any personal data processing operation concerning Elektrilevi that is carried out on the basis of a legitimate interest. When filing a Statement of Objections, Elektrilevi will consider whether the interests of the customer outweigh the interests of Elektrilevi and, if possible, will cease processing the personal data in question.

The right of objection cannot be exercised when Elektrilevi processes customer data for the performance of the contract as this would not allow Elektrilevi to fulfil its obligations under the contract. However, the customer may object to the use of the data for marketing purposes, such as sending an information letter.

The right of objection cannot be exercised also in situations where Elektrilevi needs to prepare, file or defend a legal claim, for example, where the customer has breached the contract from the point of view of Elektrilevi. Similarly, no objection can be raised if Elektrilevi processes the customer's personal data in order to fulfil its obligation under applicable legislation.

### 6.6 Right to limitation of data processing

**6.7** The Customer has the right to request that the processing of their personal data be restricted if they consider the data to be inaccurate or if the Customer needs the data to create, submit or defend a legal claim or erase them, if Elektrilevi processes the data illegally. The customer may also request a restriction on the processing of their personal data if they are processed by Elektrilevi for a legitimate

interest and the customer wishes to know whether Elektrilevi's interests outweigh the customer's interests.

### 6.8 Right to transfer data

Elektrilevi's customers have the right to transfer their consumption data (portability). This right is most easily done through AVP [here](#) because Elektrilevi transmits the customer's consumption data there, and the customer can process it for their own use, including transfer to another service provider.

## 7. USING AUTHORIZED PROCESSORS

Elektrilevi enables authorized processors to process their customers' data for specified purposes and to an extent.

Elektrilevi enters into an agreement with authorized processors for the processing of personal data. It sets out the content and duration of the processing, the nature and purpose of the processing, the type and categories of personal data, the obligations and rights of the controller.

The list of authorized processors is available on Elektrilevi's website [here](#).

## 8. DISCLOSURE OF CUSTOMER PERSONAL INFORMATION TO THIRD PARTIES

Elektrilevi will only disclose customer personal information to third parties in justified cases.

## 9. CHANGES IN CUSTOMER DATA PROCESSING POLICIES

Elektrilevi wants to keep its customers informed about all data processing activities concerning customer data. We do everything we can in order to keep the principles of processing customer data up-to-date and always available to the customer via Elektrilevi's website. You can find the latest version of the customer data processing policy [here](#). We may also notify you of significant changes by email or other agreed means.