

Elektrilevi's Principles of Processing Customer Data

May 2018

The registered office of Elektrilevi (registry code 11050857) as the chief processor of private customer data is located at Kadaka tee 63, Tallinn 12915.

Elektrilevi's customer data processing is based on the regulation from 27th April (EL) 2016/679 by the European Parliament and Council about the protection of natural persons' data when processing personal data and the free movement of such data, and about the declaration of invalidity of the directive 96/95/46/EÜ (General Data Protection Regulation), for which the English abbreviation GDPR is often used, and from other relevant legal acts

Additionally, Elektrilevi proceeds from the guidelines and instructions of Estonian Data Protection Inspectorate and European Union data protection group of experts WP29.

These principles are general, additional and/or specifying terms and conditions, and privacy statements may also be contained in agreements, documents, forms and on Elektrilevi's home page www.elektrilevi.ee.

If a customer finds that their data is not processed in accordance with the rules in force, they have the possibility to report to Elektrilevi's data protection specialist at andmekaitse@elektrilevi.ee. This opportunity does not affect the customer's constitutional right to file an application to the data protection supervision authority - Estonian Data Protection Inspectorate - or to a court.

1. DEFINITIONS

Elektrilevi uses definitions in the sense as they are defined in the General Data Protection Regulation here.

A customer is a natural person, which has signed a contract with Elektrilevi, or has provided their data and requested to register themselves as a customer, but has not signed a contract. Elektrilevi treats a possessor of an immovable with obligation to tolerate a utility network and technical infrastructure as a customer as well.

Customer data is all the data of an Elektrilevi's customer, which enables to identify, distinguish, associate or derive him/her directly or indirectly.

Any operation performed with the data of a customer is considered as processing of customer data.

In order to ensure secure processing of data, we use up-to-date physical, organizational and information technology security measures. These measures include the protection of employees, IT infrastructure, as well as office buildings and technical equipment. The goal of the application of measures is to eliminate threats and manage risks, above all. In order to ensure the implementation of measures, internal procedures of the company and the Group are introduced for compulsory compliance.

2. TYPES OF CUSTOMER DATA AND PURPOSES OF PROCESSING

2.1 Basic information and contact details

The basic information and contact details, first and foremost, are the name, personal identification code, postal address, e-mail address and phone number, which may be complemented by language of communication, country of origin, foreign personal identification code for non-residents, identity document number and date of birth. Elektrilevi processes the basic information and contact details of customers for communicating with customers for the operations related to contracts and for the performance of a contract.

Elektrilevi also processes EIC codes attributed to a measuring point or a person for the purpose of data exchange automation by the data exchange platform (AVP) in accordance with the Electricity Market Act.

Customer has the possibility to give and withdraw without providing a justification, the consent for receiving offers to their contact details or for participating in customer satisfaction surveys. It is possible to unsubscribe from the newsletter sent to customers, without justification.

Elektrilevi sends notifications to customers about power cuts to their electronic contact details. See here for more details

2.2 Network contract and subscription contract data

Data, which Elektrilevi processes for the purposes of concluding, changing and terminating contracts, based on Electricity Market Act and the Network Rules established based on it, are included among the network and subscription contract data.

2.3 Consumption place data

The consumption place data characterizes the customer's place of consumption; these include mainly the address, name and type of the place of consumption, subscription and measuring point location, and technical data.

If the customer also produces energy, in addition to consuming electrical power, then Elektrilevi processes their data, as a subscribed producer, within the purposes and to the extent pursuant to the Electricity Market Act and the Network Rules established based on it.

2.4 Consumption data

Elektrilevi process customer's measuring data for submitting invoices. The collection of measuring data takes place predominantly by means of remotely operated meters. Elektrilevi forwards the consumption data based on the Electricity Market Act and Network Rules to AVP, about the access and options for use of which can be read in more detail here.

Consumption monitoring data is also included in consumption data and Elektrilevi processes it for the purpose of making sure the reasons for losses, which can be different types of failures or illegal consumption.

When searching for the reasons for losses, Elektrilevi processes the substation customers' consumption data, persons' previous loss(es) due to failures and/or the history of illegally used electrical power or network service, the data of the places of consumption, plot location plan and views, the location plan and views of Elektrilevi's equipment,

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the measurement results of total consumed power and power flow through the meter, network and subscription contract data.

Elektrilevi will draw up a situation fixation report about the failure that caused the loss or about illegal consumption.

When identifying illegal use of electrical power or network service, Elektrilevi processes personal data for drawing up a report and for calculating the volume of illegally used electrical power and network service in accordance with the Government regulation, which provides the amount of illegally used electrical power and the volume of illegally used network services, and the procedure for the determination of the value of illegally used electrical power and network service. The regulation itself is available here. When drawing up a report about a loss due to a failure, Elektrilevi processes personal data in accordance with the Network Rules.

2.5 Billing and debt information

If the electricity seller of the customer has signed an agreement with Elektrilevi for joint billing, then Elektrilevi would forward the data of the network service bill to AVP and the electricity seller of the customer would make out and deliver the bill. In this case, debt information is also processed by the customer's electricity seller. If Elektrilevi does not have a joint billing agreement with the customer's electricity seller, then an authorized processor of Elektrilevi will process the customer's network service bill data and deliver the bill to the customer, and process his/her debt information. See here for more details.

2.6 Special types of personal data

Elektrilevi processes customers' personal data of special types as well, in limited volume based on legitimate interest. If customers themselves disclose their personal data of special types (for example the state of health, unemployment, etc.) in the course of an inquiry, then Elektrilevi uses it only for the purpose of resolving the inquiry.

2.7 Authorizations and contact persons provided by the customer

Elektrilevi processes the data of persons authorized and contact persons assigned by the customer in matters related to the performance of the contract within the limits of the authorization.

2.8 Data of claims

Elektrilevi processes the data of claims for damages to process a claim and to make a decision about compensating the damage on the basis of an application by the customer. The data of claims for damages include primarily the description of the damage, a document of error detection, estimated value of the damage, expense receipts, and settlement information, if needed. See here for more details.

2.9 Communication data

2.9.1 Security cameras are used in Elektrilevi's buildings and customer service offices for the protection of persons and assets, and the authorized processor of the data collected by the cameras is Eesti Energia AS. Access to the video footage is limited to the persons related to the security arrangement of Eesti Energia AS.

2.9.2 All calls made to the joint customer service line 777 1545 of Elektrilevi and Eesti Energia and to the fault notification line 1343 of Elektrilevi are saved. The main purpose of data processing is to offer a service as fast and simple as possible to the customers. The authorized processor of the saved calls is Eesti Energia AS.

2.9.3 When calling to the fault notification line 1343, Elektrilevi is able to determine the county of the incoming call based on the regional base number and uses that information for notifying the customer with a voice message about the failures and outages known to Elektrilevi in that region.

2.9.4 By saving the calls made to the readings line 800 4545, Elektrilevi processes the customer's contract number, address information and readings of the meter. See here for more details.

2.9.5 A limited number of Elektrilevi's employees process the calls made to electricity theft hotline with the purpose of organizing the verification of facts based on the hint received, and if needed, to process the illegal consumption in accordance with the legislation. Personal data of the caller is not specified, it will be processed only in case the person wishes to provide it.

2.9.6 Electronic and paper-based correspondence with the customer is processed by Elektrilevi or the authorized processor Eesti Energia AS with the purpose of resolving customer inquiries.

2.9.7 Elektrilevi stores the history of customer inquiries with the purpose of offering a complete service to the customer.

2.9.8 Elektrilevi uses cookies on their home page in order to remember customer settings and preferences, and thereby to make browsing on the home page more convenient. Elektrilevi does not use cookies to identify the person.

3. AUTOMATED DATA PROCESSING, INCL. PROFILE ANALYSIS

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

3.1 Based on the type of the place of consumption, the nature of the consumption and the total amount of annual consumed electrical power, Elektrilevi assigns a standard consumption schedule to the customer's place of consumption. In the basis of the standard consumption schedule and the customer's consumption data of the past 12 months, Elektrilevi predicts the amounts of electrical power in cases where the actual readings of the meter are not received. About the preparation of the forecast bill and matters related to it, see more details here.

3.2 Customer's total annual consumption and the share of the daytime tariff in percentages of the annual consumption are the basis for the suggestions given by Elektrilevi for the selection of a network package.

3.3 The total amount of electrical power consumed within the last calendar year, or more precisely, the lack of consumption or a

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consumed amount less than 250kWh, is the basis for assigning a fixed power network service fee.

4. CUSTOMERS' RIGHTS IN RELATION TO PERSONAL DATA

4.1 The right to access own data

The easiest way for the customer to access their own basic and contact information, contract data, place of consumption and consumption data is to do it at Elektrilevi's self-service environment; information can be obtained from the customer service as well.

4.2 The right to correct personal data

The customer has the right to make corrections in their data, if they are incorrect or incomplete. If customer's basic and contact information has changed or the customer finds their data to be incorrect, the customer has the right (an obligation, according to the standard terms of the contract) to correct it in self-service or customer service at any time.

Likewise, the customer can contact Elektrilevi, if they wish to clarify or correct their consumption data, primarily the amounts predicted by means of the remotely operated meter and bills made out in the basis of them.

4.3 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 situations where Elektrilevi processes customer's personal data in order to perform obligations pursuant to Electricity Market Act, Network Rules or other legal acts. The customer must also take into account that if they wish to be forgotten, they will not be able to continue using the services under the contract.

4.4 The right to object

Customer has the right to object to an operation concerning the customer's personal data processing carried out by Elektrilevi based on legitimate interest. When filing an objection, Elektrilevi will consider whether the interests of the customer outweigh the interests of Elektrilevi and will finish processing the personal data in question, if possible.

The right to object cannot be used if Elektrilevi processes customer's personal data for the performance of the contract, because this would not enable Elektrilevi to perform obligations pursuant to the contract. At the same time, the customer may object to their data being used for marketing purposes, for example for receiving the newsletter.

The right to object cannot be used also in a situation where Elektrilevi needs to prepare, submit or defend a legal claim, for example in a situation where the customer has breached the contract from Elektrilevi's point of view. Likewise, objections cannot be submitted, when Elektrilevi processes customer's personal data for the performance of an obligation pursuant to a current legal act.

4.5 The right to limit data processing

Customer has the right to demand the limitation of their personal data processing, if they find that the data is incorrect, or if the customer needs the data for preparing, submitting or defending a legal claim, or the deletion of it, in case the processing of it by Elektrilevi is illegal. The customer may also demand their personal data processing to be limited, if Elektrilevi processes it for the purpose of legitimate interest and the customer wishes to obtain clarity on whether the interests of Elektrilevi outweigh the interests of the customer.

4.6 The right to transfer the data

The customer of Elektrilevi has the right to transfer their consumption data (the right to the portability of the data). This right can be most easily carried out via AVP here: <https://e.eering.ee/#/>, because Elektrilevi forwards the customer's consumption data there and the customer can process it for their own use, including the transfer to another service provider.

5. USING AUTHORIZED PROCESSORS

Elektrilevi enables authorized processors to process their customer data for the purposes and to the extent determined.

Elektrilevi concludes personal data processing agreements with authorized processors. This provides the content and duration of the processing, the nature and the purpose of the processing, the type of the personal data and the categories of the persons, and the obligations and rights of the chief processor.

The list of authorized processors is available on Elektrilevi's website here.

6. THE ISSUE OF CUSTOMERS' PERSONAL DATA TO THIRD PARTIES

Elektrilevi issues customers' personal data to third parties only in justified cases.