



MEGAWATT-X Privacy Policy – GDPR Compliance

Introduction

This is the privacy policy of Megawatt-X Ltd, a company registered in England with registered number 7432325, and whose registered office is at 10 Bloomsbury Way - Holborn - London WC1A 2SL – UK, on behalf of itself, its affiliates and subsidiaries (Megawatt-X). Megawatt-X respects your privacy and is committed to ensuring that your personal information is used in accordance with current data protection legislation.

- This policy is structured in the following manner to aid your understanding:
- What information do we hold on you?
- How is your data collected?
- How do we use your information?
- Who do we share your information with?
- Information on transfers outside the EEA
- How long do we retain your information?
- What are your rights in relation to your information?
- Contact point in relation to this policy

For the purposes of Personal Data processing Megawatt-X has identified the following Data Subject category:

Subscriber to Megawatt-X Services, both existing and former (Subscriber) – you have requested to receive a regular Megawatt-X communication, or you access one of our free, or paid, research products or feeds online.

- **What information do we hold on you?**

We collect your name, role, firm name, email address.

When you connect to our services we log your IP address and the pages you have viewed.

If you visit our offices in London we capture CCTV images.

- **How is your data collected?**

If your firm has expressed an interest in our product(s), you have chosen to register to our service, or have been directly met by a principal of our firm and have expressed interest in accessing our service (s)

If you have bought a service from us, we will collect your name, firm name, business address and other contact details.

If you have requested one of our free service from us, we will collect your name, firm name, business address and other contact details.

If you have used our services, our systems will collect your IP address for services you have used and pages you have visited. We will also collect details on the device you used to connect, such as operating system, geographic location, browser type and language, access times and referring website addresses.

If you visit our offices in London, we capture CCTV images.



- **How do we use your information?**

Processing for the purpose of providing services:

We process your data, relying on the "legitimate interest ground". Megawatt-X's legitimate business interest, and purpose of our processing of your data, is researching the key current and historical financing, performance and investment trends in the renewable asset industry. This includes the provision of company and business professional contact information such as name, role, business address, phone number and email address. Such information will be never be displayed, shared or sold outside our company.

In order to provide our contracted services we will process your personal data to enable the creation of credentials to access our product.

Logs of access recorded by IP address are used in the process of potential system abuse and crime detection. This access is anonymized unless it is related to a sign-in by a Subscriber userID.

Logs of page views and interaction with our web product are maintained to help us to provide you with a more personalized user experience in relation to the provision of services to you.

We will use business contact details to process contractual payments.

CCTV images are used in the process of crime detection.

- **Processing for the purpose of analyzing user data:**

When you receive newsletters or promotional email from Megawatt-X, we will use personalized unique links or similar technologies to determine whether the email has been opened and which links you click. This enables us to provide you with email communications or other information that are more targeted to your needs. We will rely on our legitimate interests to do this, meaning the provision of electronic direct marketing of our data, services and products, unless legislation requires us to obtain your consent, in which case we will request this from you.

- **Who do we share your information with?**

We process your data using cloud hosting providers in the EU. We will not share your contact details with any third parties.

We will share your information with partners that provide analytics, user experience and interaction analysis of our web product. This data is pseudonymized, using cookies.

We will process online product payment information via EU-based third-party hosted payment pages that are compliant with the Payment Card Industry Data Security Standard.

We share data with a third party who helps with billing subscribers. They are a cloud-based processor in the EU. One-off billing settlement by credit card is managed by our London-based finance team using EU-based third-party payment service provider web portals that are compliant with the Payment Card Industry Data Security Standard.

Any billing arrears are referred to a debt collection agency which has a local presence in all relevant territories.

- **Transfers outside the EEA**

Our offices, operating as separate legal entities, around the world, do not have access to all contact data that we hold.

We partner with companies who analyze how our Subscribers navigate and use our website. These companies operate in the US and appropriate data protection is covered by their EU Privacy Shield certification.



- **What are your rights in relation to our use of your information?**

You have rights under data protection law in relation to our use of your information, including to:

- request access to your information, which you can do by emailing dataprotection@Megawatt-X.com stating you are submitting a Subject Access Request
- update or amend your information if it is inaccurate or incomplete by emailing dataprotection@Megawatt-X.com requesting an update
- object to certain uses of your personal data (which includes direct marketing and processing based on legitimate interests and processing for purposes of scientific or historical research and statistics) on grounds relating to your particular situation by emailing dataprotection@Megawatt-X.com.
- request the deletion of your information, or restrict its use, in certain circumstances (for example you can request that we erase your information where the information is no longer necessary for the purpose for which it was collected, unless certain exceptions apply) by emailing dataprotection@Megawatt-X.com;
- withdraw any consents you have provided in respect of our use of your information either by clicking unsubscribe links in emails or emailing dataprotection@Megawatt-X.com;
- request the return of information you have provided to us, to use for your own purposes (often called your right to data portability) where the processing is based on your consent or for the performance of a contract, and the processing is carried out by automated means;
- lodge a complaint with the Information Commissioner's Office (<https://www.ico.org.uk/global/contact-us/email/>) [or other relevant supervisory authority]. We may need to ask you for further information and identification to help us to comply with this request. More information about these rights can be found at <https://ico.org.uk/for-the-public/>. If you have any questions about these rights, or you would like to exercise any of them, please contact us at dataprotection@Megawatt-X.com.

- **How long do we retain your data?**

Contact details of Subscribers are stored for varying lengths depending on the nature and purpose for which it was collected. Megawatt-X will review your personal data periodically (usually annually) to ensure it is still necessary to be retained for the purpose for which it was collected.

System access and event logs are kept online for 28 days.

Billing data is kept for the lifetime of our contract with you and then ongoing for seven years to comply with tax legislation.

Backups of our products are retained for a year. However, we have processes to ensure if a restore is required Subject Rights are maintained.

CCTV data in the London office is retained online for a year.

- **How to contact us**

If you have any questions regarding this policy, please email dataprotection@Megawatt-X.com.

- **Changes to this policy**

We keep this privacy notice under regular review and we will place any updates on this webpage. We will inform you of any material changes to the privacy notice. This privacy notice was last updated on 9th May 2018.