

This Privacy Policy applies to Neon Charging Inc.(“Neon charging”, “we”, “us”, or “our”) and describes how we handle personal information that we collect through our website, www.neon-charging.com, mobile application, our customer dashboard, and any other website or service that link to this Privacy Policy, including, without limitation, our charging stations (collectively, “Service” or “Services”).

We may collect personal information from website visitors, users of our application, users of our Neon’s charging stations, our business customers, prospective employees, vendors, and others. The information we collect and how we use it depends on how you interact with the Services.

1. INFORMATION COLLECTION AND USE

Information you provide to us:

- **Contact information**, such as your first and last name, email address, company name, and phone number.
- **Account information**, such as your username and password you use to access our Services, and any other information you provide to your account profile when you register for an account.
- **Feedback, communications or correspondence**, such as your name, email address, telephone number and any other personal information you choose to provide when you contact us with questions, provide us with feedback, attend our events, or otherwise correspond with us. This information may also include telephone call or meeting recordings and chat records.
- **Payment information**, including name, payment card information, and billing information, contactless RFID payment methods, as applicable and as needed to allow you to use a Neon charger. This information is processed by our payment service provider, Stripe, Inc, who handle payments via credit card, ACH-transfers and other payment methods.
- **Marketing information**, such as your preferences for receiving communications about our Services, and details about how you engage with our communications.
- **Surveys and reviews information**, such as name, contact information, reviews and survey responses when you complete any of our surveys or write a review on the Service.

- **Other information** that we may collect, which is not specifically listed here, but which we will use in accordance with this Privacy Policy or as otherwise disclosed at the time of collection.

Information we obtain from third parties:

- **Social media.** We may maintain pages on social media platforms, such as Instagram, Twitter, LinkedIn, and other third-party platforms. When you visit or interact with our pages on those platforms, the platform provider's privacy policy will apply to your interactions and their collection, use and processing of your personal information. You or the platforms may provide us with information through the platform, and we will treat such information in accordance with this Privacy Policy.
- **Third-party login information.** When you link, connect, or login to the Services with a third-party service (e.g., Google, Microsoft and others), you direct the service to send us information (e.g., contact information) controlled by that service or as authorized by you via your privacy settings at that service.

We use a third-party payment platform to handle receipt of payment for transactions at Neon. In particular, we require you to submit payment information to Stripe Inc. ("Stripe") and utilize Stripe to process payments on our behalf. For more information on the privacy practices of Stripe, please visit <https://stripe.com/privacy>. Stripe's services are governed by Stripe's terms of use which can be found at <https://stripe.com/checkout/terms>.

- **Other sources.** We may obtain your personal information from other third parties, such as publicly available sources, and data providers.

Automatic data collection. We, our advertising partners, and our service providers may automatically log information about you, your computer or mobile device, your vehicle, and your interaction over time with our website and the Services, our communications and other online services, such as:

- **Device data,** such as your computers or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), mobile device identifier, MAC address, IP address, language settings, mobile device carrier, and radio/network information (e.g., WiFi, LTE, 3G).

- **Vehicle data**, including vehicle type (such as vehicle year, make, model, vehicle identification number, configuration), battery status, use of Near Field Communication (NFC) in the vehicle.
- **Charging data**. When you use a Neon charging station, we may collect information about your charging session, such as charging station used, MAC address associated with a Neon charger, charging session date, start time, end time, duration, energy dispensed, battery analytics and performance, charging port identification number, power cycle patterns, idle times, vehicle state of charge, voltage, and amperage, and payment method.
- **Location information**. When you use the Service, we may collect general location information, such as city, state, or geographic area (for example by using your Internet Protocol (IP) address). If you install our mobile application, we may ask you to grant us access to your mobile device's geolocation data. If you grant such permission, we may collect information about your precise geolocation, and we may use that information to provide you with location-based features (e.g., for identification of Neon charging stations available near you). If you access the Service through a mobile device and you do not want your device to provide us with location-tracking information, you may disable the GPS or other location-tracking functions on your device. See your device manufacturer's instructions for further details. If you disable certain functions, you may be unable to use certain parts of the Services.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to our website, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access, and whether you have opened our marketing emails or clicked links within them.

We use the following tools for automatic data collection:

- **Cookies**, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, and helping us understand user activity and patterns.
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.

- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.
- **Session replay technologies.** We use services provided by our third-party service providers that employ cookies, local storage and similar technologies to record and allow us to review replays of user sessions when you use our Services. The replays include users' clicks, mouse movements, scrolls, text entered, and time spent on the webpage during those sessions and other data. These replays help us better understand the activity occurring on our Services, diagnose usability problems, optimize the user experience and provide us with information that we may use to improve our Services and/or to help us to develop new Services.

2. **PERSONAL INFORMATION USE**

We use your personal information for the following purposes:

To operate our Services:

- Provide, operate, maintain, and secure our Services, including providing support, troubleshooting, and processing refunds.
- Communicate with you about our Services, including by sending you announcements, updates, security alerts, and support and administrative messages.
- Respond to your requests, questions, and feedback.

Improve, monitor, and personalize the Services, which includes:

- analyzing usage patterns to improve and personalize your experience with the Services or other aspects of our business; and
- recording video, audio, and website chats with our customers or users for various purposes related to our business, including for training purposes, to improve customer or user experience, to market and improve our Services and to develop new Services.

Surveys and reviews. We may use your personal information to conduct surveys and collect feedback from reviews you provide to us. Further, we may use and disclose aggregated and/or anonymized data from survey responses and reviews for any business purposes.

For marketing and advertising. We, our service providers, and our third-party advertising partners may collect and use personal information for the following marketing and advertising purposes:

- **Direct marketing.** We may send you direct marketing communications as permitted by law, including by email. You may opt out of our marketing communications as described in the “Opt out of marketing communications” section below.

Vendor/Partner relationships. Where you are a vendor/partner or a representative of a vendor/partner, we use your personal information to contact you and to manage our relationship with you and/or your company. If we have entered into a contract with you/your company, we will use your personal information as required for us to perform our contractual obligations under the relevant contract.

Compliance and protection, including to:

- Comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.
- Protect our, your or others’ rights, privacy, safety, or property (including by making and defending legal claims).
- Audit our internal processes for compliance with legal and contractual requirements and internal policies.
- Enforce the terms and conditions that govern our Services.
- Prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

3. **PERSONAL INFORMATION DISCLOSURE**

Neon does not sell or rent your Personal Information to marketers or third parties. We may share your Personal Information with trusted third parties who are integral to the operation of our Website and App, including but not limited to financial institutions, payment processors, verification services and credit bureaus, Providers and their parking enforcement personnel or subcontractors as well as any third parties that you have directly authorized to receive your Personal Information. We may store your Personal Information in locations outside the direct control of Neon, for instance, on servers or databases co-located with Providers. If we offer links to third party service through Neon and you choose to access these services, you authorize the third party service to access your Neon account using our platform,

you acknowledge that we may share payment transaction data and related information with the third party that provides the authorized application. The use of your information by such third parties will be subject to their applicable privacy policy, which you should carefully review before accessing the service.

If Neon undertakes or is involved in any merger, acquisition, reorganization, going-public event, sale of assets or bankruptcy, insolvency or any similar event, then we may sell, transfer or share some or all of our assets, including your Personal Information. In this event, we will notify you before your Personal Information is transferred and becomes subject to a different privacy policy.

4. YOUR RIGHTS AND CHOICES

We are required to collect certain Personal Information to confirm your identity and comply with our obligations. If you elect not to provide Personal Information in optional fields it may limit your ability to use Neon. You can update your account information by signing on to our Website or App with your Neon account. We may occasionally email you with information about offers or new services. You can opt out of these email communications via an unsubscribe link included in such communications. However, you will continue to receive certain email communications related to your account including information regarding transactions and your relationship with Neon.

Neon has a variety of obligations to retain the data that you provide us, both to ensure that transactions can be appropriately processed, settled, refunded or charged back, to identify fraud, and also to comply with laws applicable to us and to our banking providers and credit card processors. Accordingly, even if you close your Neon account, we will retain certain information as necessary to meet our obligations.

Neon retains and destroys personal information in accordance with its data retention policy. We may retain personal information to provide you with information about your past account usage for tax and accounting purposes and for business purposes. If you close your account, we will make best efforts to delete or anonymize all of your personal information that is not required to be kept under our data retention policy within a reasonable time.

5. DATA SECURITY

We employ a number of technical, organizational, and physical safeguards designed to protect the personal information we collect. However, no security measures are failsafe,

and we cannot guarantee that such information may not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software. No Internet or email transmission or electronic storage of information is ever fully secure or error free. Therefore, you should take special care in deciding what information you send via the Services.

6. CHILDREN

Our Services are not intended for use by children under 16 years of age. If we learn that we have collected personal information through the Services from a child under 16 without the consent of the child's parent or guardian as required by law, we will delete it.

7. CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the website.

It's important that you review any changed or modified privacy policy. If you do not wish to agree to the changed privacy policy, then we will not be able to continue providing the Website and App to you, and your only option will be to stop accessing the Website and App and deactivate your Neon account.

8. CONTACT US

Neon welcomes your questions or comments regarding this Privacy Policy. Please direct any questions or comments about this Privacy Policy or our privacy practices to: contact@neon-charging.com