

# Allego Group

## Privacy Policy

Last updated: October, 2025

### Introduction

The Allego Group Entities (collectively, "Allego"), are committed to protecting the privacy of the personal information ("Personal Information") that you share with us, including Personal Information related to individuals who may be users, customers, prospective customers, employees, agents, job applicants or others.

Allego takes its responsibilities towards processing your personal data seriously. This Privacy Policy describes Allego's practices how we collect, use, disclose, transfer and store your personal data. It also outlines your privacy rights. Privacy is an ongoing responsibility, and so Allego will from time to time update this Privacy Policy in case Allego undertakes new practices with regard to processing personal data or adopt new privacy policies.

By utilizing the chargers, website(s), apps, products, services, software application and social media sites made available by Allego, you have consented to the collection, use and disclosure of your Personal Information in accordance with this privacy policy ("Privacy Policy" or "Policy"). This Policy is specifically addressed to those who then provide Personal Information to Allego. We encourage you to read this Privacy Policy carefully.

This Policy is based on the privacy and data protection principles common to the countries in which we operate. This Policy is intended to summarize Allego's data protection practices generally and to advise our charger users, app users, other product, services and application customers, prospective customers, job applicants, website visitors, social media visitors and other third parties about Allego's privacy policies that may be applicable to them.

### Who is responsible for your Personal Information?

Allego is responsible for the Personal Information that we may collect in the manner discussed below. Allego includes: Allego Holding B.V., Westervoortsedijk 73 KB, 6827 AV Arnhem, The Netherlands; Allego Innovations B.V., Westervoortsedijk 73 KB, 6827 AV Arnhem, The Netherlands; Allego N.V., Westervoortsedijk 73 KB, 6827 AV Arnhem, The Netherlands; Allego B.V., Westervoortsedijk 73 KB, 6827 AV Arnhem, The Netherlands; Allego GmbH, Stralauer Platz 34, 10243 Berlin, Germany; Allego België B.V., Schaliënhoevedreef 20T, 2800 Mechelen, Belgium; Allego Charging Ltd., Saffery Champness, 71 Queen Victoria Street, London, EC4V 4BE, United Kingdom; Allego France SAS, 6 Rue de Berri, 75008 Paris, France; Allego Denmark ApS, Langelinie Allé 35, 2100 København, Denmark; Allego Norway AS, Apotekergata 10B, 0180 Oslo, Norway; Allego Portugal Unipessoal Lda, Avenida Infante D. Henrique 26, 1149 – 096 Lisbon, Portugal; Allego Sweden AB, Drottninggatan 86, 111 36 Stockholm, Sweden; Allego Italy S.R.L., Torino (TO) Corso Valdocco 2 CAP 10122, Italy; Allego Spain S.L.U., p/a Latorre: Calle Suero de Quinones 34-36, 28002 Madrid, Spain; Allego Poland Sp. Z o.o., ul. Bitwy Warszawskiej 1920 r 7, 02-366 Warsaw, Poland; Allego Charging Oy, c/o Dittmar & Indrenius, Pohjoisesplanadi 25 A, 00100 Helsinki, Finland; Allego Estonia OÜ, Pärnu mnt 139e/2-8, 11317 Tallinn, Estonia; Allego Lithuania AUB, Gedimino pr. 20, LT-01103 Vilnius, Lithuania; Allego Switzerland GmbH, c/o CMS von Erlach Partners AG, Räflestrasse 26, 8045 Zurich, Switzerland; Allego Austria GmbH, c/o Climate Lab Spittelauer Lände 45, 1090 Vienna, Austria; Allego, električne polnilnice, d.o.o., Bleiweisova cesta 30, 1000 Ljubljana, Slovenia; and their respective affiliates (the "Allego Group Entities"). Specifically, your Personal Information will be controlled by the Allego Group Entity that is providing services or a communication to you. In some

instances your Personal Information will be processed and/or controlled by more than one Allego Group Entity.

## Data Protection Officer

We have designated a Data Protection Officer (“DPO”) to enhance and promote compliance with and understanding of privacy and data protection principles. If you wish to do any of the above or if you wish to contact the DPO if you have any questions or concerns about Allego’s Privacy Policy or practices, Allego’s Data Protection Officer’s contact information is as follows:

Allego Holding B.V.  
Attn: Data Protection Officer  
Industriepark Kleefse Waard  
Westervoortsedijk 73  
6827 AV Arnhem  
The Netherlands  
[dpo@allego.eu](mailto:dpo@allego.eu)  
+31 (0)88-7500300

## What Personal Information We Collect and How We Use It

Allego collects Personal Information from you. Below we explain under what scenarios we collect Personal Information, what Personal Information it may include, how we use the Personal Information, on what legal basis we process the Personal Information, and for how long we keep the Personal Information.

- Processing during (or following) opening a guest session, account creation, subscription, logging in or use in one of the applications or websites such as Smoov, Allego DXP or the Allego Subscription Program (Fisker app):
  - This Personal Information can include initials, first name, last name, email address, telephone number, Facebook account name, Google account name, charge card, bank account number and credit card number.
  - Allego uses this Personal Information to provide you with any of these (web- or app-based) applications or subscriptions including remembering your preferred settings, payment preferences for charging sessions, finding a charging station and (in the near future) reserving charging stations.
  - Such Personal Information will be processed on the basis of the existence of a contract with Allego to use the applicable (web- or app-based) application (Article 6 (1) (b) of the GDPR), Allego’s legitimate interest in providing personal preferences (Article 6 (1) (f) of the GDPR) and in order to comply with legal obligations (Article 6 (1) (c) of the GDPR).
  - Personal Information that is processed while using these services as a guest (like favorizing), will be erased each time when you close the applicable (web- or app-based) application. Personal Information that is received from Facebook or Google for logging in with Facebook or Google accounts is not used and Allego automatically deletes this after 90 days - the permission to use these Facebook or Google accounts can always be revoked through your Facebook and Google accounts.
- Processing during (or following) the use of your location data, on one of the applications

- of websites such as Smoov, Allego DXP, Allego Subscription Program (Fisker app):
- You can use some applications or websites to locate, check availability, and (in the near future) reserve Allego charging stations. The default setting in such apps and websites is set to not track your location. If you want to use our apps and websites however to look up, check availability, and (in the near future) reserve charging stations you must give explicit permission/consent through apps and websites on your phone or browser to use your location cf. Article 6 (1) (a) of the GDPR. Then the Personal Information that we will process for that will be the IP address and/or GPS coordinates of the location from which you access the (web- or app-based) application.
  - Allego uses this Personal Information then (meaning, upon consent) to allow to show chargers in the vicinity to check their availability, and (in the near future) to reserve such charging stations.
  - Such Personal Information will then (meaning, upon consent) be processed on the basis of the existence of consent (Article 6 (1) (a) of the GDPR).
  - Allego does not store, nor track your location through this functionality. For this function.
  - Be aware however, the terms and conditions as well as privacy settings of Google maps or any other location service may apply.
- Processing when entering or using a charging card or plug&charge identifier, and/or having charging sessions through your charging card or plug&charge on one of the chargers, applications or websites of Allego.
    - To be able to use your charging card or plug&charge method, as issued and provided by a charging card service provider (i.e. Mobility Service Provider - MSP), you must enter your charge card number issued by your MSP on applications or websites of Allego or you must present your charging card issued by your MSP at the suitable reader at a charger, or you must connect your plug&charge car to a charger. This Personal Information thus includes your charging card's or plug&charge's method's unique number, which is linked to your personal account.
    - Allego uses this Personal Information to then allow having charging sessions that will be billed via or to your MSP. This processing of this personal data is necessary for Allego and your service provider to enable you to charge your vehicle if you use this means. Your charging card or plug&charge method details are directly sent through a secured connection to the relevant MSP, enabling the charging sessions to be invoiced to your MSP. Your historical charging sessions that you carried out at Allego charging stations with your charging card may be made visible in your account for logged in users (via email, or via Facebook or Google) on applications or websites of Allego, whereas it is not made visible for guest users or when presenting your charging card method at the suitable reader at a charger or when connecting your plug&charge vehicle at the suitable reader at a charger.
    - Such Personal Information will then be processed on the basis on the basis of the existence of a contract with Allego to use the chargers cf. Article 6 (1) (b) of the GDPR, as well as for bookkeeping purposes cf. Article 6 (1) (c) of the GDPR.
    - Please contact your service provider if you have any questions about how your MSP processes your Personal Information, as your MSP also process your Personal Information relating to your charging card.
  - Processing when entering or using a direct debit method and/or having subscription fees and/or charging sessions through a direct debit method on one of the applications or

websites of Allego.

- To be able to use your direct debit method, you must enter your direct debit method details. This Personal Information thus includes your bank account number, your name, initials, your address and your email address.
  - Allego uses this Personal Information to then allow offering a subscription and/or having charging sessions that will be billed via direct debit method. This processing of this personal data is necessary for Allego to offer the paid subscription or to enable you to charge your vehicle if you use this means. Your direct debit details are directly sent through a secured connection to the relevant payment service provider, enabling the subscription fees or charging sessions to be credited from your financial institution that issued the bank account. Your historical subscription status or charging sessions that you carried out at Allego charging stations with the direct debit method may be made visible in your account for logged in users (via email, or via Facebook or Google), whereas it is not made visible for guest users.
  - Such Personal Information will then be processed on the basis of the existence of a contract with Allego to pay and use the subscription and/or the chargers cf. Article 6 (1) (b) of the GDPR, as well as for bookkeeping purposes cf. Article 6 (1) (c) of the GDPR. For users who consented to the payment service provider and/or Allego to store the Personal Information for payment of future subscription fees or charging sessions, such Personal Information will then be processed on the basis of the basis of consent cf. Article 6 (1) (a) of the GDPR too.
  - Allego does not itself store the bank account information. However, Allego is able access payment data, for example for our trouble shooting and carrying out reimbursements, or for users who consented to the payment service provider and/or Allego to store the Personal Information for payment of future charging sessions.
- Processing when entering or using a credit card method and/or having subscription fees and/or having charging sessions through a credit card method on one of the chargers, applications or websites of Allego.
  - To be able to use your credit card method, you must enter your credit card method details or you must present your credit card at the suitable reader at a charger. This Personal Information thus includes your credit card number, and when used on applications or websites of Allego also your name, initials, your address and your email address.
  - Allego uses this Personal Information to then allow offering a subscription and/or having charging sessions that will be billed via credit card method. This processing of this personal data is necessary for Allego to offer the paid subscription or to enable you to charge your vehicle if you use this means. Your credit card details are directly sent through a secured connection to the relevant payment service provider, enabling the subscription fees or charging sessions to be credited from your financial institution that issued the bank account. Your historical subscription status or charging sessions that you carried out at Allego charging stations with the credit card method may be made visible in your account for logged in users (via email, or via Facebook or Google) on applications or websites of Allego, whereas it is not made visible for guest users or when presenting your credit card method at the suitable reader at a charger.
  - Such Personal Information will then be processed on the basis of the existence of a contract with Allego to pay and use the subscription and/or the chargers cf. Article 6 (1) (b) of the GDPR, as well as for bookkeeping purposes cf. Article 6 (1) (c) of the GDPR. For users who consented to the payment service provider and/or

- Allego to store the Personal Information for payment of future subscription fees or charging session, such Personal Information will then be processed on the basis on the basis of consent cf. Article 6 (1) (a) of the GDPR too.
- Allego does not itself store the credit card information. However, Allego is able access payment data, for example for our trouble shooting and carrying out reimbursements, or for users who consented to the payment service provider and/or Allego to store the Personal Information for payment of future charging sessions.
  - Processing when contacting the Allego service desk.
    - You can correspond with us by email, telephone, or the postal service.
    - Allego uses this Personal Information to respond to your inquiry; to notify you on other related services; or to keep a record of your complaint, request, and the like.
    - Such Personal Information will then be processed on the basis of Allego's legitimate interest of responding to your inquiries and questions cf. Article 6 (1) (f) of the GDPR.
  - Processing when leaving feedback.
    - When you use chargers, website(s), apps, products, services and applications made available by Allego, you can leave us feedback to tell us how we are doing. For this purpose we collect your user ID and username or your name, address, phone number and/or email address.
    - Allego uses this Personal Information to be able to improve our products and services.
    - Such Personal Information will then be processed on the basis of Allego's legitimate interest in improving our products and services cf. Article 6 (1) (f) of the GDPR.
  - Processing when subscribing to marketing communications, client surveys and newsletters.
    - You can subscribe to our marketing communications, client surveys and newsletters. For this purpose, you must first grant us explicit permission to use your e-mail address, and possibly also your first name, last name. By subscribing to our marketing communications, client surveys and newsletters you can receive news updates about Allego, Allego products and services, upcoming events, and developments in the eMobility industry.
    - Allego uses this Personal Information then (meaning, upon consent) to allow to news updates about Allego, Allego products and services, upcoming events, and developments in the eMobility industry or to solicit participation in surveys.
    - Such Personal Information will then (meaning, upon consent) be processed on the basis of the existence of consent (Article 6 (1) (a) of the GDPR).
    - Allego will retain your name and e-mail address for as long as you wish to use this service. You can withdraw your permission at any time by clicking on the unsubscribe link at the bottom of a newsletter. If you withdraw your permission, your name and e-mail address will be removed from our mailing list.
  - Processing when using the website.
    - Allego uses Google Analytics to collect various types of information about the usage of our websites. Types of automatically collected information or Personal Information include: network or Internet Protocol (IP) address and the browser you use (e.g., Chrome, Safari, Firefox, Internet Explorer), the type of operating system you use, (e.g., Microsoft Windows or Mac OS), device identifiers (such as

an Apple IDFA or an Android Advertising ID), device settings, browser settings and the Allego web pages you have visited. Allego uses this Personal Information to be able to improve our products and services.

- Such Personal Information will then be processed on the basis of Allego's legitimate interest in improving our products and services cf. Article 6 (1) (f) of the GDPR, or where you consented (i.e. to cookies), on the basis of the existence of consent (Article 6 (1) (a) of the GDPR).
  - Allego's cookies policy may apply. For that, the Cookie section at the bottom of the Allego webpage for more information about how the aforementioned information may be collected and used.
- Processing when participating in a promotional campaign or giveaway draw
    - You can participate in the promotional campaigns or giveaways. For this purpose, you must first grant us explicit permission to use your name and/or e-mail address. You participating in a promotional campaign or giveaway you will receive news updates about Allego, Allego products and services, upcoming events, and developments in the eMobility industry or about the promotional campaign or giveaway draw.
    - Allego uses this Personal Information then (meaning, upon consent) to allow to news updates about Allego, Allego products and services, upcoming events, and developments in the eMobility industry or to solicit participation in surveys.
    - Such Personal Information will then (meaning, upon consent) be processed on the basis of the existence of consent (Article 6 (1) (a) of the GDPR).
    - You can withdraw your permission and consequently your participation at any time by notifying Allego. If you withdraw your permission, your participation and you name and e-mail address will be removed.
  - Processing when improving our services
    - We use data about all charging sessions for internal purposes (for example: time, duration, location of the charging session).
    - Allego uses this to improve the quality and coverage of our charging stations.
    - The legal basis is Allego's legitimate interest in improving our products and services cf. Article 6 (1) (f) of the GDPR.
  - Processing when applying for a charging station
    - If you apply for the installation of a charging station within the public space of a municipality, we process Personal Information that may include your name, address, e-mail address and telephone number.
    - Processing this Personal Information is necessary to obtain approval from your municipality for the installation of a charging station. All personal data used for the approval and installation process of a charging station in your municipality will not be used for any other purpose.
    - Such Personal Information will be processed on the basis of the existence of Allego's legitimate interest for having a role in the application process with the municipality (Article 6 (1) (f) of the GDPR) and in order to comply with legal obligations (Article 6 (1) (c) of the GDPR).
    - Allego will keep a record of your application for the duration of the charger operation, in order to contact you for technical matters such as service interruptions.
    - We also share your personal information with the municipality in which in the charging station will be commissioned. Allego and the municipality share, under prevailing regulatory requirements, equal responsibilities with regard to the



protection of your personal data. This entails that Allego and the respective municipalities endeavour to refrain from disclosing to third parties, in any way whatsoever, either directly or indirectly, either orally or in writing, or in any other way, any confidential information regarding the applicant of a charging station. Allego and the municipality shall use your personal data exclusively for the performance of their agreements to install charging stations within the municipality. To avoid any ambiguity: information about the application or usage of a charging station that has been disclosed by Allego to the municipality cannot be used in any other way than for the stated intended purpose. You can also contact the municipality in which you applied for the charging station for any questions you may have about the processing of your personal data.

- Processing when using social media services and other third party platforms
  - You also can engage with our content with social media services or other third party platforms, such as Facebook, LinkedIn, or other third-party social media plug-ins, integrations and applications. When you engage with our content on or through social media services or other third party platforms, plug-ins, or applications, you can allow us to gain access to certain information in your profile by virtue of using these social media services. This may include your name, e-mail address, photo, gender, birthday, location, an ID associated with the applicable third party platform, or social media account user files such as photos and videos, your list of friends or connections, people you follow and/or who follow you, or your posts or 'likes'. When we interact with you through our content on third party websites, applications, integrations or platforms, we can obtain information regarding your interaction with that content (e.g. measure total amount of likes and engagement).
  - Such Personal Information will then (meaning, upon consent) be processed on the basis of the existence of consent (Article 6 (1) (a) of the GDPR), or on the legal basis is Allego's legitimate interest in improving our products and services cf. Article 6 (1) (f) of the GDPR.
  - For a description on how social media services and other third party platforms, plug-ins, integrations or applications handle your information, please refer to their respective privacy policies and terms of use, which will instruct you how to modify your privacy settings.

## **How long we retain personal data**

We retain personal data for as long as the customer relationship continues, for the duration of any ongoing legal disputes, and as long as required by applicable accounting regulations. Additionally, we may retain data for up to seven years after the last interaction to address follow-up questions or complaints. The applicable retention period is determined by whichever of these conditions ends last.

## **When and How We Share Information with Third Parties**

Allego only shares your personal data with contracted third parties who are facilitating the delivery of services on behalf of Allego.

The personal information Allego processes from you is stored in one or more databases hosted by third parties Allego has contracted and are located in the European Union. These third parties do not use or have access to your personal data for any purpose other than cloud storage and retrieval related to the services of Allego.

We do not otherwise reveal your personal data to third parties for their independent use unless: (1) you request or authorize it cf. article 6 (1) (a) of the GDPR; (2) the information is provided to comply with the law (for example a court order), enforce an agreement we have with you, or to protect our rights cf. Article 6 (1) (c) or our legitimate interest in defending or establishing legal claims cf. Article 6 (1) (f) of the GDPR; or (3) the information is provided to our agents or service providers who perform functions on our behalf. We also gather aggregated (but not personally identifiable) information about charging sessions and application and website usage and use such aggregated information to our partners, service providers, and/or other third parties for improving (related) services.

## **Transferring Personal Data within the European Economic Area**

For Personal Information subject to the General Data Protection Regulation (EU) 2016/679 ("GDPR") or the UK General Data Protection Regulation ("UK GDPR") we may transfer your Personal Information outside the EEA or the United Kingdom (the "UK") for the Permitted Purposes as described above. This may include countries that do not provide the same level of protection as the laws of your home country (for example, the laws within the EEA or the UK). We will ensure that any such international transfers are made subject to appropriate or suitable safeguards if required by the GDPR, UK GDPR or other relevant laws. You may contact us at any time using the contact details below if you would like further information on such safeguards.

With respect to persons covered by GDPR, in case Personal Information is transferred to countries or territories outside of the EEA, or in the case of UK GDPR outside of the UK, that are not recognized by the European Commission as offering an adequate level of data protection, we have put in place appropriate data transfer mechanisms to ensure Personal Information is protected.

## **Updating your Personal Information**

If any of the Personal Information that you have provided to us changes, for example if you change your email address or if you wish to cancel any request that you have made of us, please let us know by contacting Allego's DPO. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete Personal Information that you provide to us.

## **Rights for persons or information covered by GDPR or the UK GDPR**

With respect to residents of the EEA and the UK, as well as in situations where your Personal Information is processed by an Allego Group Entity established in the EEA or the UK, or Quebec ("Covered Individuals"), you have a number of legal rights under GDPR and/or UK GDPR in relation to the Personal Information that we hold about you. These rights include:

- Obtaining information regarding the processing of your Personal Information and access to the Personal Information that we hold about you. Please note that there may be regulatory circumstances in which we are entitled to refuse requests for access to copies of Personal Information;
- If you wish to confirm that Allego is processing your personal data;
- The purpose of the processing;
- The categories of Personal Information involved;
- Who else outside Allego might have received the data from (or through) Allego;
- How long the information will be stored.
- Requesting that we correct your Personal Information if it is inaccurate or incomplete;
- Requesting that we erase your Personal Information in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal information but we are legally entitled or required to retain it. Also note that erasing your



- Personal Information may result in discontinuing access to services to you;
- Objecting to, and requesting that we restrict, our processing of your Personal Information in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your Personal Information but we are legally entitled to refuse that request;
  - Withdrawing your consent, although in certain circumstances it may be lawful for us to continue processing without your consent if we have another legitimate reason (other than consent) for doing so;
  - Obtaining computerized Personal Information collected from you in a structured, commonly used and technological format (right to data portability).

We have designated a Data Protection Officer ("DPO") to enhance and promote compliance with and understanding of privacy and data protection principles. If you wish to do any of the above please send an email to [dpo@allego.eu](mailto:dpo@allego.eu).

We may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorized disclosure of data. We reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your data and for any additional copies of the Personal Information you request from us.

If access cannot be provided within a reasonable time, Allego will inform you about an expected date on which this information will be provided. If for some reason a request for access to information is denied, Allego will provide a rationale for doing so.

We will consider any requests or complaints that we receive and provide you with a response in a timely manner. If you are not satisfied with our response, you may take your complaint to the relevant privacy regulator. We will provide you with details of your relevant regulator upon request.

You have a right to lodge a complaint with you local data protection authority regardless of the country in which you use Allego's chargers, website(s), apps, products, services or software application.

## **Security of Your Personal Data**

To help protect the Personal Information you provided to Allego for processing, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your personal data to those staff members who need to be aware of this information to provide benefits or services to you. In addition, we train our staff members about the importance of confidentiality and maintaining the privacy and security of your information. We are committed to taking appropriate disciplinary measures to enforce our staff members' privacy responsibilities.

## **Changes and Updates to This Privacy Policy**

As our services and use of technology may change from time to time, this Privacy Policy is expected to change as well. We reserve the right to amend this Privacy Policy at any time, for any reason. We then publish the amended Privacy Policy on our applications or website, to apply to new products or services that you may obtain from Allego. For new processing of already provided Personal Information we will actively inform you via email. We may publish reminders of our Privacy Policy on our website, but we advise you to frequently check our website to review the currently applicable Privacy Policy and any changes that may have been implemented in it since its previous version.

## Questions, Comments or Complaints

If you have any questions or comments about this Privacy Policy or if you would like to obtain information about any of your personal information stored by us, please contact us at:

Allego Holding B.V.  
Attn: Data Protection Officer  
Industriepark Kleefse Waard  
Westervoortsedijk 73  
6827 AV Arnhem  
The Netherlands  
[dpo@allego.eu](mailto:dpo@allego.eu)  
+31 (0)88-7500300