

# SOLARWATT Manager portal

EN Privacy policy for end customers



---

# PRIVACY POLICY FOR END CUSTOMERS

Our company takes the protection of personal data very seriously. We want you to know when we save which data and how we use it. When processing personal data, we comply with the provisions of the EU General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG).

When using our internet platform „SOLARWATT Manager portal“, you have the option of determining the access options of Solarwatt and/or your installer yourself. This also determines the scope of the data processing required for this by Solarwatt and/or your installer and/or another/additional installer added during the use of the portal.

To determine the access options in more detail, various options are available to you during the registration process and subsequently on the platform itself in the „Remote maintenance“ and „Monitoring my system“ section of your user account. Please familiarize yourself with the underlying terms of use for end customers and consider the extent to which you wish to make personal data available to whom.

Below we provide you with the necessary information in accordance with Art. 13, 14 GDPR:

## 1. Name and address of the controller

**The controller within the meaning of the GDPR and the BDSG is**

Solarwatt GmbH  
Maria-Reiche-Str. 2a  
01109 Dresden  
info@solarwatt.com  
Telephone: +49-351-8895-0  
Fax: +49-351-8895-100

## 2. Name and address of the data protection officer

You can reach the data protection officer of Solarwatt GmbH at

**[datenschutz@solarwatt.com](mailto:datenschutz@solarwatt.com)**

Any data subject can contact our data protection officer directly at any time with any questions or suggestions regarding data protection.

## 3. Legal basis for the processing of personal data

Insofar as you have given your consent to the processing of your personal data, Art. 6 para. 1 lit. a GDPR serves as the legal basis. The processing of personal data that we need to fulfill a contract or for pre-contractual measures is based on Art. 6 para. 1 lit. b GDPR. Insofar as processing is carried out to fulfill a legal obligation to which we are subject, Art. 6 para. 1 lit. c GDPR serves as the legal basis. If processing is necessary to safeguard our legal interests or those of a third party and if the interests, fundamental freedoms and fundamental rights of the data subject (i.e. yours) do not outweigh this, Art. 6 para. 1 lit. f GDPR serves as the legal basis.

---

## 4. Data erasure and storage duration

Your personal data will be deleted or blocked as soon as the purpose of its storage no longer applies. Data may be stored for longer if this is stipulated by the European or national legislator in regulations, laws or other provisions to which we are subject.

The scope and time of data deletion depends on the settings you have made in rights management.

## 5. Description and scope of data processing

In order to use the Manager portal and make use of our services, various personal data is collected and processed. Please note that Solarwatt and your installer may jointly determine the purpose and means of data processing. In addition, the conditions set out in section 8 apply.

The following data is collected, depending on your selection of settings in rights management:

- Master data (login data for the Manager portal such as name, e-mail address, address, password, etc.) used for registration and use
- Information on generation and consumption values of the photovoltaic system
- Internet service provider of the user
- IP address of the user
- Date and time of access
- User settings
- Functional status and device configurations of the Manager device
- Functional status and configurations of synchronized devices
- Requests with regard to error messages and troubleshooting

If you have connected a SOLARWATT battery storage system or inverter to your Manager, the following data is also collected:

- Serial number, software version numbers
- Status and error messages
- Configuration data (system settings of your device)
- Operating data (voltages, energy currents and other derived parameters as well as consumption data of the respective household)

The legal basis for the storage of the data is Art. 6 para. 1 lit. a GDPR, provided that you have given your consent. For the fulfillment of inquiries and other orders on your part, the legal basis is Art. 6 para. 1 lit. b GDPR.

The collection of certain data is absolutely necessary for the provision and operation of the Manager portal. This applies to all data required for the registration process.

By granting access rights to Solarwatt and/or your installer, the processing of personal data is also necessary for monitoring and/or remote maintenance. The scope of the data to be used is determined by the respective function and can be found in the terms of use for end customers.

## 6. Recipients and transfer to third countries

Within our company, the departments that are responsible for processing your request have access to your data. In addition, we use external service providers, in particular processors, if we cannot or cannot reasonably perform services ourselves. These external service providers are primarily providers of IT services that operate on the basis of a so-called order processing contract in

---

accordance with Art. 28 GDPR. The platform is technically operated by Kiwigridd GmbH, Kleiststraße 10 a-c, 01129 Dresden. A transfer to third countries outside the European Economic Area (EEA) only takes place under certain conditions within the framework of Art. 44ff GDPR.

The European Commission certifies that some third countries have a level of data protection comparable to the EEA standard by means of so-called adequacy decisions (a list of these countries and a copy of the adequacy decisions can be found here: [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.html](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.html)). However, in other third countries to which personal data may be transferred, there may not be a consistently high level of data protection due to a lack of legal provisions. If this is the case, we ensure that data protection is adequately guaranteed. This is possible through binding corporate rules, standard data protection clauses of the European Commission for the protection of personal data (available at <https://eur-lex.europa.eu/legal-content/DE/TXT/PDF/?uri=CELEX:32010D0087&from=DE>), certificates or recognized codes of conduct. You can contact our data protection officer if you would like more information on this.

## 7. Your rights as a data subject

If your personal data is processed by us, you are a data subject within the meaning of the GDPR. You therefore have the following rights vis-à-vis us as the controller

### 7.1. Right to confirmation

Every data subject has the right to obtain from the controller confirmation as to whether or not personal data concerning him or her is being processed.

### 7.2. Right to information

You have the right to obtain from the controller free information about the personal data stored about you and a copy of this information at any time. Furthermore, the European legislator has granted the data subject access to the following information

- the purposes of the processing
- the categories of personal data being processed
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations
- if possible, the planned duration for which the personal data will be saved or, if this is not possible, the criteria for determining this duration
- the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing
- the existence of the right to lodge a complaint with a supervisory authority
- if the personal data are not collected from the data subject: All available information about the origin of the data
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject

---

Furthermore, the data subject has a right to information as to whether personal data has been transferred to a third country or to an international organization. If this is the case, the data subject also has the right to obtain information about the suitable guarantees in connection with the transfer.

### **7.3. Right to rectification**

You have the right to request the immediate rectification of inaccurate personal data concerning you. Furthermore, the data subject has the right to request the completion of incomplete personal data, including by means of a supplementary declaration, taking into account the purposes of the processing.

### **7.4. Right to erasure (right to be forgotten)**

You have the right to obtain from the controller the erasure of personal data concerning you without undue delay where one of the following grounds applies and insofar as the processing is not necessary

- The personal data have been collected or otherwise processed for such purposes for which they are no longer necessary.
- The data subject withdraws consent on which the processing is based according to point (a) of Article 6(1) GDPR, and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to Art. 21 (1) GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Art. 21 (2) GDPR.
- The personal data have been processed unlawfully.
- The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

If one of the above reasons applies and you wish to request the erasure of personal data saved by us, you can contact us and our data protection officer (email: [datenschutz@solarwatt.com](mailto:datenschutz@solarwatt.com)) at any time.

### **7.5. Right to restriction of processing**

You have the right to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead.
- The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims.
- The data subject has objected to processing pursuant to Article 21(1) GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by us, they can contact us and our data protection officer (email: [datenschutz@solarwatt.com](mailto:datenschutz@solarwatt.com)) at any time.

---

## 7.6. Right to data portability

You have the right to receive the personal data concerning you, which you have provided to a controller, in a structured, commonly used and machine-readable format. They also have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on consent pursuant to point (a) of Article 6(1) GDPR or point (a) of Article 9(2) GDPR or on a contract pursuant to point (b) of Article 6(1) GDPR and the processing is carried out by automated means, unless the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Furthermore, in exercising their right to data portability pursuant to Art. 20 (1) GDPR, the data subject has the right to have the personal data transmitted directly from one controller to another, where technically feasible and provided that this does not adversely affect the rights and freedoms of others.

## 7.7. Right to object

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on point (e) or (f) of Article 6(1) GDPR. This also applies to profiling based on these provisions.

In the event of an objection, we will no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by us for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

The data subject is also free, in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to exercise his or her right to object by automated means using technical specifications.

## 7.8. Right to withdraw consent under data protection law

You have the right to withdraw your consent to the processing of personal data at any time without affecting the lawfulness of processing based on consent before its withdrawal.

If the data subject wishes to exercise their right to withdraw consent, they can contact us and our data protection officer (email: [datenschutz@solarwatt.com](mailto:datenschutz@solarwatt.com)) at any time.

### **This means that**

**To exercise your rights, you can contact us by email at: [info@solarwatt.com](mailto:info@solarwatt.com) or by post at Solarwatt GmbH, Maria-Reiche-Str. 21, 01109 Dresden or directly to our data protection officer at [datenschutz@solarwatt.com](mailto:datenschutz@solarwatt.com).**

## 7.9. Right to lodge a complaint with the supervisory authority

In addition, without prejudice to any other administrative or judicial remedy, you have the right to complain to a data protection supervisory authority about the processing of your personal data by

---

us. The state data protection officer can be contacted at the following e-mail address: saechsdsb@slt.sachsen.de

## 8. Setting cookies

Cookies may be used when operating the Manager portal. Cookies are small text files that are stored on your end device's battery and, if applicable, saved to the end device you are using and through which certain information flows to the body that sets the cookie. Cookies cannot execute programs or transfer viruses to your end device and therefore cannot cause any damage. They serve to make our website more user-friendly and effective overall, i.e. more pleasant for you.

Cookies cannot directly identify a user, but can contain data that makes it possible to recognize the device used. In some cases, however, cookies only contain information on certain settings that are not personally identifiable.

A distinction is made between session cookies, which are deleted as soon as you close your internet session, and permanent cookies, which are saved beyond the individual session. In terms of their function, a distinction is made between cookies:

- **Technically necessary cookies:** these are absolutely necessary in order to move around our website, use basic functions and ensure the security of the website; they do not collect information about you for marketing purposes, nor do they save which websites you have visited;
- **Performance cookies:** These collect information about how you use our website, which pages you visit and, for example, whether errors occur when using the website; they do not collect any information that could identify you - all information collected is anonymous and is only used to improve our website and to find out what interests our users;
- **Advertising cookies, targeting cookies:** These are used to offer the user needs-based advertising within our website or offers from third parties and to measure the effectiveness of these offers; advertising and targeting cookies are saved for a maximum of 36 months;
- **Sharing cookies:** These are used to improve the interactivity of our website with other services (e.g. social networks); sharing cookies are saved for a maximum of 36 months.

Any use of cookies that is not absolutely technically necessary constitutes data processing that is only permitted with your express and active consent in accordance with Art. 6 para. 1 sentence 1 lit. a GDPR, § 25 para. 1 TTDSG. This applies in particular to the use of advertising, targeting or sharing cookies. In addition, we only pass on your personal data processed by cookies to third parties if you have given your express consent in accordance with Art. 6 para. 1 sentence 1 lit. a GDPR, § 25 para. 1 TTDSG. Please note that when using cookies, your data may be transferred to recipients outside the EEA where there is no adequate level of data protection in accordance with the GDPR (e.g. USA). Details on this can be found in the following description of the individual marketing tools.



---

The following cookies are set:

### **Marketing**

These technologies are used by advertisers to serve ads that are relevant to your interests.

### **GOOGLE ANALYTICS**

This is a web analytics service. It allows the user to measure advertising return on investment „ROI“ and track user behavior with Flash, video, websites and applications.

Processing company: Google Ireland Limited

Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland

### **Data processing purposes**

This list shows the purposes of data collection and processing.

Marketing purposes

Analytics

Technologies used

cookies

Pixel

JavaScript

Device fingerprint

### **Data collected**

This list contains all (personal) data collected during or through the use of the service.

Click path

Date and time of the visit

Device information

Location information

IP address

Pages visited

Referrer URL

Browser information

Host name

Browser language

Browser type

Screen resolution

Device operating system

Interaction data

User behavior

Visited URL

---

## Legal basis

The required legal basis for the processing of data is stated below.

Art. 6 para. 1 sentence 1 lit. a GDPR

## Place of processing

European Union

## Retention period

The retention period is the period of time during which the collected data is saved for processing. The data must be deleted as soon as it is no longer required for the specified processing purposes. The retention period depends on the type of data stored. Each customer can choose how long Google Analytics saves data before it is automatically deleted.

## Data recipients

Google Ireland Limited, Alphabet Inc, Google LLC

## Data protection officer of the processing company

Below you will find the e-mail address of the data protection officer of the processing company

[https://support.google.com/policies/contact/general\\_privacy\\_form](https://support.google.com/policies/contact/general_privacy_form)

## Transfer to third countries

This service may transfer the data collected to another country. Please note that this service may transfer data to a country that does not offer an adequate level of data protection. If the data is transferred to the USA, there is a risk that your data may be processed by US authorities for control and monitoring purposes without you having any legal recourse. Below you will find a list of the countries to which the data is transferred. For more information on the security guarantees, please refer to the website provider's privacy policy or contact the website provider directly.

## United States of America, Singapore, Chile, Taiwan

Click here to read the privacy policy of the data processor <https://policies.google.com/privacy?hl=en>

Click here to revoke on all domains of the processing company <https://tools.google.com/dlpage/ga-optout?hl=de>

Click here to read the cookie policy of the data processor <https://policies.google.com/technologies/cookies?hl=en>

## Storage information

Below you can see the longest potential storage duration on a device set when using the cookie storage method and when using other methods.

Maximum limit for the storage of cookies: 2 years

---

## **HOTJAR**

This is a web analytics service. It is used to collect data about user behavior. Hotjar may also process information provided by you as part of surveys and feedback functions that are integrated on our website.

### **Processing company**

Hotjar Limited

Dragonara Business Centre, 5th Floor, Dragonara Road, Paceville St Julian's STJ 3141, Malta

### **Data processing purposes**

This list shows the purposes of data collection and processing.

Analytics

feedback

Technologies used

Cookies

### **Data collected**

This list contains all (personal) data collected during or through the use of the service.

Date and time of the visit

Device type

Geographical location

IP address

Mouse movements

Pages visited

Referrer URL

Screen resolution

Unique device identifier

Language information

Device operating system

Browser type

Clicks

Domain name

Unique user ID

Responses to surveys

### **Legal basis**

The required legal basis for the processing of data is stated below.

Art. 6 para. 1 sentence 1 lit. a GDPR

---

## Place of processing

European Union

## Retention period

The retention period is the period of time during which the collected data is saved for processing. The data must be deleted as soon as it is no longer required for the specified processing purposes.

Data about your visit and your activities on the website are generally saved for 365 days and then automatically deleted. This does not apply to information collected as part of surveys and incoming feedback. However, the data will always be deleted as soon as it is no longer required for the purposes of processing.

## Data recipients

Hotjar Ltd, Amazon Web Services EMEA SARL, Datadog Inc, Functional Software Inc.

## Data protection officer of the processing company

Below you will find the e-mail address of the data protection officer of the processing company. [dpo@hotjar.com](mailto:dpo@hotjar.com)

## Transfer to third countries

This service may transfer the data collected to another country. Please note that this service may transfer data to a country that does not offer an adequate level of data protection. If the data is transferred to the USA, there is a risk that your data may be processed by US authorities for control and monitoring purposes without you having any legal recourse. Below you will find a list of the countries to which the data is transferred. For more information on the security guarantees, please refer to the website provider's privacy policy or contact the website provider directly.

## United States of America

Click here to read the privacy policy of the data processor <https://www.hotjar.com/legal/policies/privacy>

Click here to revoke on all domains of the processing company <https://www.hotjar.com/legal/compliance/opt-out>

Click here to read the cookie policy of the data processor <https://help.hotjar.com/hc/en-us/articles/115011789248-Hotjar-Cookies>

## Storage information

Below you can see the longest potential storage duration on a device set when using the cookie storage method and when using other methods.

Maximum limit for the storage of cookies: 1 year

---

### **Technically necessary cookies**

These technologies and cookies are required for the core functionalities of the website. They are used for secure and intended use; deactivation of the technologies and cookies is therefore not available.

### **GOOGLE TAG MANAGER**

This is a tag management system. Google Tag Manager allows tags to be integrated centrally via a user interface. Tags are small sections of code that can track activities. Script codes from other tools are integrated via the Google Tag Manager. The Tag Manager makes it possible to control when a specific tag is triggered.

### **Processing company**

Google Ireland Limited

Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland

### **Data processing purposes**

This list shows the purposes of data collection and processing.

Tag management

Technologies used

Website tags

Data collected

This list contains all (personal) data collected during or through the use of the service.

Aggregated data about the tag triggering

### **Legal basis**

The required legal basis for the processing of data is stated below.

Art. 6 para. 1 sentence 1 lit. a GDPR

### **Place of processing**

European Union

### **Retention period**

The retention period is the period of time during which the collected data is saved for processing.

The data must be deleted as soon as it is no longer required for the specified processing purposes.

The data will be deleted 14 days after retrieval.

### **Data recipients**

Alphabet Inc, Google LLC, Google Ireland Limited

Data protection officer of the processing company

---

Below you will find the e-mail address of the data protection officer of the processing company [https://support.google.com/policies/contact/general\\_privacy\\_form](https://support.google.com/policies/contact/general_privacy_form)

### **Transfer to third countries**

This service may transfer the data collected to another country. Please note that this service may transfer data to a country that does not offer an adequate level of data protection. If the data is transferred to the USA, there is a risk that your data may be processed by US authorities for control and monitoring purposes without you having any legal recourse. Below you will find a list of the countries to which the data is transferred. For more information on the security guarantees, please refer to the website provider's privacy policy or contact the website provider directly.

### **Singapore,Taiwan,Chile,United States of America**

Click here to read the privacy policy of the data processor <https://policies.google.com/privacy?hl=en>

Click here to read the cookie policy of the data processor <https://policies.google.com/technologies/cookies?hl=en>

### **USERCENTRICS CONSENT MANAGEMENT PLATFORM**

This is a consent management service. Usercentrics GmbH is used on the website as a processor for the purpose of consent management.

### **Processing company**

Usercentrics GmbH, Sendlinger Str. 7, 80331 Munich, Germany

### **Purposes of data processing**

This list shows the purposes of data collection and processing.

Compliance with legal obligations

Consent storage

Technologies used

Local storage

### **Data collected**

This list contains all (personal) data collected during or through the use of the service.

Opt-in and opt-out data

Referrer URL

User agent

User settings

Consent ID

---

Time of consent  
Consent type  
Template version  
Banner language

### **Legal basis**

The required legal basis for the processing of data is stated below.  
Art. 6 para. 1 sentence 1 lit. c GDPR

### **Place of processing**

European Union (consent database is located in Belgium)

### **Retention period**

The retention period is the period of time during which the collected data is saved for processing.  
The data must be deleted as soon as it is no longer required for the specified processing purposes.

Consent data (consent and withdrawal of consent) is saved for three years. The data will then be deleted immediately.

### **Data recipient**

Usercentrics GmbH

Data protection officer of the processing company

Below you will find the e-mail address of the data protection officer of the processing company.

[datenschutz@usercentrics.com](mailto:datenschutz@usercentrics.com)

Click here to read the privacy policy of the data processor <https://usercentrics.com/privacy-policy/>

### **TECHCOOKIES**

These cookies are required for technical reasons so that you can use the functions offered in the Manager portal.

For example, cookies record the user's authentication data after logging in to the Manager portal so that the user can move between the so-called „apps“ within the Manager portal and always remain logged in. These cookies also ensure that a user-specific configuration of the portal functions (selected language, etc.) is retained across sessions. In addition, these cookies contribute to the secure and proper use of the website.

Technically required cookies perform the following range of tasks:

- 
- Controlling the language selection of the current session.
  - Storage when an active session is available.
  - Browser session cookies after successful login.

SOLARWATT Manager portal uses these cookies to simplify the use of the Manager portal. With the help of cookies, Solarwatt can recognize you from previous visits when you visit the Manager portal again.

### **Processing company**

Solarwatt GmbH  
Maria-Reiche-Str. 2a, 01109 Dresden, Germany

### **Legal basis**

The required legal basis for the processing of data is stated below.  
Art. 6 para. 1 s. 1 lit. a GDPR

### **Place of processing**

Germany

### **Retention period**

The retention period is the period of time during which the collected data is saved for processing. The data must be deleted as soon as it is no longer required for the specified processing purposes.

The retention period depends on the type of data stored. Each customer can use their browser settings to determine when the data is automatically deleted.

### **Data protection officer of the processing company**

Below you will find the e-mail address of the data protection officer of the processing company.

siegemund@datenconsulting.de

Click here to read the data processor's privacy policy <https://www.solarwatt.de/datenschutz>

## **9. Information about the joint processing of personal data with your installer**

### **9.1. Reason for joint controllership**

The operation of the SOLARWATT Manager portal enables you to use various functionalities of the portal within the framework of the terms of use for end customers and to make use of services from Solarwatt and/or your installer („the parties“) via the portal. Depending on the various rights you grant Solarwatt and/or your installer, they may have access to personal data. As both - depending on your selection during registration or subsequently in the user account in the „Remote



---

maintenance“ area - can access and/or change or supplement the same data, joint data processing may occur. The parties have jointly determined the order in which the personal data is processed in the individual processing stages. They are therefore jointly responsible for the protection of your personal data within the process stages described below (Art. 26 GDPR). However, the scope of joint responsibility always depends on your default settings in rights management.

## 9.2. Process steps for the processing of personal data

To log in to the Manager portal, your installer must send you an email invitation via the InstallerCenter with a corresponding login link. The collection and processing of the data required for the e-mail invitation is the sole responsibility of your installer, as Solarwatt has no influence on this. You can then use the login link to register in the Manager portal. The collection and processing of the data provided by you is the sole responsibility of Solarwatt, as your installer has no influence on the design of the user interface and the personal data to be entered there.

By registering in the Manager portal, you will be able to view certain usage and consumption data and use other functionalities of your Manager. Your permission for monitoring during registration („Allow monitoring for Solarwatt and the installer.“) opens up the possibility of so-called monitoring for Solarwatt and your installer. Monitoring gives both parties „read access“ to your data, i.e. both parties use the same data pool. You can give Solarwatt and/or the installer permission to monitor even after registration. To do this, you must first add the installer to your user account. The integration of the installer is initiated by the installer sending an e-mail request for monitoring access with a link.

In addition, with your permission for remote maintenance purposes during registration („Remote maintenance for Solarwatt and the installer.“), you also enable „write access“ (so-called remote maintenance). This enables the respective party to not only have read access to your data in the Manager portal, but also to make changes to this data themselves. Depending on your settings in rights management, these changes can then also be used by the other party. You can also grant Solarwatt and/or the installer permission for remote access after registering in your user account in the „Remote maintenance“ area by ticking the box „Enable extended access for remote maintenance“ under the heading „Remote access (write permissions) to my system“.

If, in connection with your use of the Manager portal, further contractual agreements are concluded with Solarwatt and/or your installer, e.g. on the provision of specific services after a fault has been detected, these agreements are not subject to joint data processing and are not covered by these regulations.

The same applies if you exclude your installer or Solarwatt from monitoring and remote maintenance. In these cases, the joint responsibility of the parties ends.

Solarwatt is solely responsible for the data processing operations required for the technical provision of the Manager portal. Your installer has no influence on the operation of the platform, but - depending on the rights granted - on the data processing operations triggered by the use of the platform.

---

### 9.3. Agreement between the parties on joint data processing

As part of their joint responsibility under data protection law, Solarwatt and your installer have defined in a corresponding agreement who has to fulfill which obligations under the statutory data protection regulations. This applies in particular to the exercise of the rights of the data subjects and the fulfillment of the information obligations pursuant to Art. 13 and 14 GDPR.

Such an agreement is necessary because the operation of the Manager portal - depending on your settings in the rights management - enables Solarwatt and/or the installer to use personal data of the other party and to access the master data and other data of the Manager stored on the portal separately and jointly.

In this respect, there are essentially three processing stages, depending on your settings in rights management. In cases where both Solarwatt and the installer are granted all rights of so-called monitoring and remote maintenance, both parties are jointly responsible for the personal data processed in this context.

In the first section, in which the personal data is processed by the installer using the InstallerCenter, the installer alone is responsible for the data processing. SOLARWATT Manager portal is solely responsible for the technical operation of the Manager portal.

Both parties are solely responsible for services commissioned via the Manager portal but not processed via this portal (see Terms of Use for End Customers).

### 9.4. Significance for the data subjects

In the processing sections in which there is joint responsibility, the parties - depending on their settings in rights management - fulfill the data protection obligations in accordance with their respective responsibilities for the sections as follows:

In the context of joint responsibility, your installer is solely responsible for the processing of personal data in the InstallerCenter (except for the technical provision of the Installer Center), and Solarwatt is solely responsible for the technical operation of the Manager portal. Both parties are jointly responsible for the use and processing of data in the context of so-called monitoring and/or so-called remote maintenance.

Solarwatt and/or the installer shall make the information required pursuant to Art. 13, 14 GDPR available to the data subjects free of charge in a precise, transparent, comprehensible and easily accessible form in clear and simple language (as in these data protection provisions). Each party shall provide the other party with all necessary information from its sphere of activity.

Solarwatt and/or the installer shall inform each other immediately of any legal positions asserted by data subjects. They shall provide each other with the information required to respond to requests

---

for information. However, it is advisable for data subjects to assert their rights with the controller for whom the content of the request is more closely related to their area of activity. This means that rights related to the technical operation of the Manager portal are asserted against Solarwatt and rights related to registration in the InstallerCenter are asserted against the original installer (who sent the invitation link for registration in the Manager portal). Likewise, such rights in connection with actions carried out by the installer in the Manager portal should be asserted against the installer. The scope and content of your rights are determined in accordance with section 7.

## **10. Changes to this privacy policy**

Future changes to our privacy policy will be published on the Manager portal website and, if necessary, notified to you by email. Please check regularly for updates or changes to our privacy policy.

---

## ***Any questions? Please contact us.***

*We want to make it as easy as possible to actively participate in the energy revolution. Feel free to use the support area on our website. If you still have questions about the installation, commissioning or maintenance of our products, our technical customer service is looking forward to your call.*

Solarwatt GmbH  
Maria-Reiche-Straße 2a  
01109 Dresden

+49-351-8895-555  
info@solarwatt.com

[solarwatt.com](https://solarwatt.com)