

ANNEX 1

DESCRIPTION OF PROCESSING

to the DPA pursuant to Art. 28 GDPR

Convenience translation. Only the German version is legally binding.

Scope statement

WISNOTS processes personal data exclusively to handle registrations of energy systems on behalf of the Controller. The Controller remains the applicant towards grid operators, metering point operators and registers. No processing for the Processor's own purposes takes place.

1) Purposes of processing

- Receiving and preparing the system and operator data submitted by the Controller
- Checking completeness against the requirements of the competent body
- Submitting the registration to the grid operator, metering point operator or register on behalf of the Controller
- Handling queries from the competent body
- Monitoring deadlines and following up until the case is completed
- Registration in the Market Master Data Register, where commissioned
- Providing the case status to the Controller

2) Processing operations (nature of processing)

- Receiving documents and data by email, upload or interface
- Extracting and structuring information from submitted documents
- Entering data in portals and forms of the competent bodies
- Transmission to the competent body
- Storage for case handling and traceability
- Communication with the competent body and the Controller

3) Categories of data subjects

- System operators and end customers of the Controller (natural persons whose system is being registered)
- Employees and contact persons of the Controller
- Where applicable, other persons involved in the case, to the extent submitted by the Controller (e.g. property owners)

4) Types of personal data

Operator and end-customer data: name, address of the system location, billing address, email address and telephone number, signature on forms and powers of attorney. Depending on the requirements of the competent body, additionally: date of birth, tax or VAT identification number, bank details for processing the feed-in tariff.

System and connection data relating to persons: meter number, market location and metering location ID, system location, technical details of the system, details of the meter cabinet

Documents: order confirmations, data sheets, site plans, photos of the meter cabinet and the system, commissioning and completion forms, other documents submitted by the Controller

Data of the Controller's contact persons: name, business email address, telephone number, role, access credentials for the Processor's service

Technical operating and audit data: sign-ins, access and change logs, timestamps, IP addresses where necessary for security and evidence

5) Art. 9 data (special categories)

Not subject to processing. The Controller does not submit special categories of personal data.

6) Processing locations / data residency

Processing	Provider	Location
Database, file storage, backups	Convex	AWS eu-west-1, Dublin (Ireland)
Server functions (API connection, form filling, portal automation)	Vercel	fra1, Frankfurt am Main; further EU regions under DPA Clause 12.2
AI routing	Requesty, EU endpoint	AWS eu-central-1, Frankfurt am Main
AI models	per Annex 3 Part B	exclusively data centres in the EU
Email mailbox	Microsoft 365	data centres in the EU
Sending and receiving email	Resend	sent from Ireland (eu-west-1); stored in the USA

For access from third countries and the transfer bases, see DPA Clause 12.3 and Annex 3.

7) Recipients

At the Controller: authorised users and contact persons

At the Processor: only authorised persons on a need-to-know basis

Third parties: grid operators, metering point operators and registers to which the registration is submitted on behalf of the Controller. They are independent controllers for the processing of the data they receive.

Sub-processors: see Annex 3

8) Access credentials for third-party portals

If the Controller provides access credentials for installer registers or grid operators' portals, they are stored encrypted, used exclusively for case handling, logged and deleted without delay on request.

9) Deletion and retention logic

- Case data is retained for the duration of processing and for evidence purposes
- Standard retention after completion of a case: 3 years, in line with the regular limitation period under Section 195 BGB
- Where case documents are also subject to commercial or tax retention obligations, the statutory periods under Section 257 HGB and Section 147 AO apply

- Access credentials for third-party portals are deleted without delay after the end of the cooperation or on request
- Logs and backups in accordance with Annex 2

Berlin, 28 September 2026

WISNOTS GmbH